

Science Advisory Board (SAB) Draft Report (6/5/14) to Assist Meeting Deliberations - Do not Cite or Quote

This draft is a work in progress, does not reflect consensus advice or recommendations, has not been reviewed or approved by the chartered SAB, and does not represent EPA policy.

1 EPA-SAB-14-xxx

2

3 The Honorable Gina McCarthy

4 Administrator

5 U.S. Environmental Protection Agency

6 1200 Pennsylvania Avenue, N.W.

7 Washington, D.C. 20460

8

9 Subject: SAB Review of the Draft EPA Report *Connectivity of Streams and Wetlands to*
10 *Downstream Waters: A Review and Synthesis of the Scientific Evidence*

11

12 Dear Administrator McCarthy:

13

14 The EPA's Office of Research and Development (ORD) requested that the Science Advisory
15 Board (SAB) review the draft report titled *Connectivity of Streams and Wetlands to Downstream*
16 *Waters: A Review and Synthesis of the Scientific Evidence (September 2013 External Review*
17 *Draft)* ("Report"). The Report is a review and synthesis of the peer-reviewed literature on the
18 connectivity or isolation of streams and wetlands relative to large water bodies such as rivers,
19 lakes, estuaries, and oceans. The Report was developed by ORD to inform an EPA and U.S.
20 Army Corps of Engineers rulemaking to clarify the jurisdiction of the Clean Water Act.

21

22 In response to the EPA's request, the SAB convened an expert panel to review the Report. The
23 SAB was asked to comment on: the clarity and technical accuracy of the Report; whether it
24 includes the most relevant peer reviewed literature; whether the literature has been correctly
25 summarized; and whether the findings and conclusions are supported by the available science.
26 The enclosed report provides the SAB's consensus advice and recommendations.

27

28 The Report is a thorough and technically accurate review of the literature on the connectivity of
29 streams and wetlands to downstream waters. The SAB agrees with two of the three major
30 conclusions in the Report. The SAB finds that the review of the scientific literature strongly
31 supports the conclusions that streams and "bidirectional" floodplain wetlands are physically,
32 chemically, and/or biologically connected to downstream navigable waters. The SAB
33 recommends some revisions to improve the clarity of the Report, better reflect the scientific
34 evidence, and make the document more useful to decision-makers. The SAB disagrees with the
35 conclusion that there is insufficient information available to generalize about the connectivity of
36 wetlands in "unidirectional" non-floodplain settings. In that case, the SAB finds that the
37 scientific literature supports a more definitive conclusion that numerous functions of
38 "unidirectional" non floodplain wetlands sustain the physical, chemical, and/or biological
39 integrity of downstream waters. The SAB's major comments and recommendations are provided
40 below.

41

- 42 • The Report often refers to connectivity as though it is a binary property (connected versus
43 not connected) rather than as a gradient. In order to make the Report more technically
44 accurate, the SAB recommends that the interpretation of connectivity be revised to reflect a
45 gradient approach that recognizes variation in the frequency, duration, magnitude,
46 predictability, and consequences of those connections. The SAB notes that in certain

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1 systems, such as headwater streams and tributaries and floodplain wetlands, relatively low
2 levels of connectivity can be ecologically meaningful in terms of impacts on downstream
3 waters.
4

- 5 • The SAB recommends that the EPA consider expanding the brief overview of approaches to
6 measuring connectivity. This expansion would be most useful if it provided examples of the
7 dimensions of connectivity that could most appropriately be quantified, ways to construct
8 connectivity metrics, and the methodological and technical advances that are most needed.
9
- 10 • The Report presents a conceptual framework that describes the hydrologic elements of a
11 watershed and the types of connections that link them. The literature review supporting the
12 framework is technically accurate and clearly presented. However, to strengthen and improve
13 its usefulness, the SAB recommends that the framework be expressed as spatially continuous
14 physical, hydrological (surface and subsurface), chemical, and biological flowpaths that
15 connect watersheds. The water body classification system used in the Report (i.e.,
16 classification of waters according to landscape settings) should be integrated into the
17 flowpath framework to show that continuous phenomena interact across landscape settings.
18 In addition, the SAB recommends that each section of the Report be clearly linked to the
19 conceptual framework.
20
- 21 • The SAB recommends that the Report more explicitly address the cumulative and
22 aggregative effects of streams, groundwater systems, and wetlands on downstream waters. In
23 particular, the Report should contain a discussion of the spatial and temporal scales at which
24 streams, groundwater systems, and wetlands are functionally aggregated. The SAB also
25 recommends that, throughout the Report, the EPA further discuss several important issues
26 including the role of biological connectivity, biogeochemical transformation processes, and
27 the effects of human alteration of connectivity.
28
- 29 • In the Report, the EPA has classified waters and wetlands as having the potential for either
30 “bidirectional” or “unidirectional” hydrologic flows with rivers and lakes. The SAB finds
31 that these terms do not adequately describe the four-dimensional (longitudinal, lateral,
32 vertical, and temporal) nature of connectivity and the SAB recommends that the Report use
33 more commonly understood terms that are grounded in the peer-reviewed literature.
34
- 35 • The SAB commends the EPA for the comprehensive literature review in the Report, though
36 additional citations have been suggested to strengthen it further. To make the review process
37 more transparent, the EPA should more clearly describe the approach used to screen,
38 compile, and synthesize the information.
39
- 40 • The SAB finds that the review and synthesis of the literature describing connectivity of
41 streams to downstream waters reflects the pertinent literature and is strongly grounded in
42 current science. The literature review provides strong scientific support for the conclusion
43 that ephemeral, intermittent, and perennial streams exert a strong influence on the character
44 and functioning of downstream waters and that all tributary streams are connected to
45 downstream waters. The SAB also recommends that the literature review more thoroughly

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1 address hydrologic exchange flows between main channels and off channel areas, the
2 influence of stream temperature on downstream waters, and the movement of biota
3 throughout stream systems to use critical habitats.
4

- 5 • The SAB finds that the review and synthesis of the literature on the connectivity of waters
6 and wetlands in floodplain settings is somewhat limited in scope (i.e., focused largely on
7 headwater riparian wetlands) and should be expanded. However, the literature review does
8 substantiate the conclusion that floodplains and waters and wetlands in floodplain settings
9 support the physical, chemical, and biological integrity of downstream waters. The SAB
10 recommends that the Report be reorganized to clarify the functional role of floodplain
11 systems in maintaining the ecological integrity of streams and rivers and that the Report more
12 fully reflect the literature on lateral exchange between floodplains and rivers.
13
- 14 • The SAB finds that the review and synthesis of the literature on the connectivity of non-
15 floodplain (“unidirectional”) waters and wetlands is generally thorough and technically
16 accurate. However, additional information on biological connections should be included.
17
- 18 • The SAB disagrees with the EPA’s conclusion that the literature reviewed did not provide
19 sufficient information to evaluate or generalize about the degree of connectivity (absolute or
20 relative) or the downstream effects of wetlands in “unidirectional” non-floodplain landscape
21 settings. The SAB finds that the scientific literature supports a more definitive statement
22 about the functions of “unidirectional” non-floodplain wetlands that sustain the physical,
23 chemical, and/or biological integrity of downstream waters. In this regard, the SAB
24 recommends that the EPA revise the conclusion to better articulate: (1) what is supported by
25 the scientific literature and, (2) the issues that still need to be resolved.
26
- 27 • The SAB also recommends that the Report clearly indicate that all aquatic habitats have
28 some degree of connection to downstream waters through the transfer of water, chemicals or
29 biota, though the magnitude and effects of these connections vary widely across wetlands.
30

31 The SAB appreciates the opportunity to provide the EPA with advice on this important subject.
32 We look forward to receiving the agency’s response.
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34

35 Sincerely,
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This report has been written as part of the activities of the EPA Science Advisory Board (SAB), a public advisory group providing extramural scientific information and advice to the Administrator and other officials of the Environmental Protection Agency. The SAB is structured to provide balanced, expert assessment of scientific matters related to problems facing the Agency. This report has not been reviewed for approval by the Agency and, hence, the contents of this report do not necessarily represent the views and policies of the Environmental Protection Agency, nor of other agencies in the Executive Branch of the Federal government, nor does mention of trade names of commercial products constitute a recommendation for use. Reports of the SAB are posted on the EPA Web site at <http://www.epa.gov/sab>

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2 **Science Advisory Board**
3 **Panel for the Review of the EPA Water Body Connectivity Report**
4

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* Resigned from Panel March 2014

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1. EXECUTIVE SUMMARY

The National Center for Environmental Assessment in the EPA Office of Research and Development (ORD) has developed a draft report titled *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence (September 2013 External Review Draft)*. The draft report (hereafter referred to as the “Report”) is a review and synthesis of the peer-reviewed scientific literature on the connectivity or isolation of streams and wetlands relative to large water bodies such as rivers, lakes, estuaries, and oceans. The purpose of the Report is to summarize the current understanding of these connections, the factors that influence them, and the mechanisms by which connected waters affect the function or condition of downstream waters. The Report was developed to inform an EPA and U.S. Army Corps of Engineers rulemaking to clarify the jurisdiction of the Clean Water Act. The Report is a scientific review and, as such, it does not set forth legal standards for Clean Water Act jurisdiction.

The literature review and synthesis in the Report focuses on describing: (1) a conceptual framework that represents the hydrologic elements of a watershed, the types of physical, chemical, and biological connections that link them, and the watershed climatic factors that influence connectivity at various spatial and temporal scales; (2) the downstream connectivity and effects of ephemeral, intermittent, and perennial streams; (3) the downstream connectivity and effects of waters and wetlands in riparian/floodplain settings; and (4) the downstream connectivity and effects of waters and wetlands in non-riparian/non-floodplain settings. Six case studies from the literature are included in the report to illustrate the connectivity of water bodies in different landscape settings and geographic regions.

The EPA asked the SAB to review the Report and comment on: the clarity and technical accuracy of the document; whether it includes the most relevant peer reviewed literature; whether the literature has been correctly summarized; and whether the findings and conclusions in the Report are supported by the available science. This Executive Summary highlights the findings and recommendations of the SAB in response to the charge questions provided in Appendix A.

Overall Clarity and Technical Accuracy of the Report

The SAB was asked to provide its overall impressions of the clarity and accuracy of the Report. The SAB generally finds that the Report is an extensive review of the literature on the connectivity of streams and wetlands to downstream¹ waters that is generally thorough and technically accurate. However, the Report could be strengthened by careful editing to ensure that it is more clearly organized, concise, and written in a consistent style and voice. Some terms and definitions are not used consistently throughout the document. The SAB has proposed a revised conceptual framework which describes the hydrologic elements of a watershed and the connections that link them, and recommends that it be used to integrate the entire Report. Each section of the document should be clearly linked to this framework. In addition, the key points in each chapter of the Report should be clearly stated at end of the chapter.

¹ In this SAB report, the term “downstream” is used to refer broadly to connectivity that is both downstream and downgradient. All water (e.g., surface water, hyporheic flows, and groundwater) flows downgradient toward lesser hydraulic head than at the point of origin or point of interest. For most surface water flows, downgradient is also downstream. Sometimes the term “downgradient” is used in this report to emphasize instances where hyporheic and groundwater flows are especially important.

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1 The EPA should also consider including in the Executive Summary a succinct table summarizing all of
2 the key findings of the Report.

3
4 The Report is a science, not policy, document that was written to support the EPA's efforts to clarify the
5 jurisdiction of the Clean Water Act. Within this context, the Report could be more useful to decision-
6 makers if it brought more clarity to the interpretation of connectivity, especially with respect to
7 quantification of the frequency, duration, predictability, magnitude, and consequences of connectivity.
8 The language used in the Report often suggests that connectivity is a binary property (connected versus
9 not connected) rather than a gradient. The SAB recommends that the interpretation of connectivity be
10 revised to reflect a gradient approach that recognizes variation in the frequency, duration, magnitude,
11 predictability, and consequences of connections. Moreover, in certain systems, such as headwater
12 streams and tributaries and floodplain wetlands, relatively low levels of connectivity can be ecologically
13 meaningful in terms of impacts on downstream waters. The SAB also recommends that the Report more
14 explicitly address the cumulative effects of streams and wetlands on downstream waters and the spatial
15 and temporal scales at which functional aggregation should be evaluated.

16
17 The literature review in the Report could be strengthened by including additional citations and more
18 clearly describing the approach used to screen, compile, and synthesize the information and by including
19 additional references provided by the SAB. The SAB finds that the case studies in the Report provide
20 helpful illustrations of the connectivity of streams and wetlands in certain geographic areas to
21 downstream waters, but they would be of greater relevance if the reasons why they were selected (i.e.,
22 the important points they illustrate) and how they fit into the conceptual framework (i.e., where different
23 systems fall along the connectivity gradient) were more apparent. It would also be helpful to present the
24 case studies more succinctly in text boxes throughout the document.

25
26 **Clarity and Technical Accuracy of the Conceptual Framework in the Report**

27
28 The SAB was asked to comment on the clarity and technical accuracy of the conceptual framework of
29 watershed structure and function presented in the Report. The literature review supporting the
30 conceptual framework is technically accurate but the SAB recommends some revisions to improve the
31 clarity, accuracy, and usefulness of the framework. The SAB recommends clearly delineating the
32 Report's scope in terms of the types of wetlands and water bodies covered and focusing on functional
33 roles of floodplains and riparian areas irrespective of their classification as waters and wetlands under
34 the Clean Water Act. Connectivity should be defined at the beginning of the Report and the SAB
35 recommends that this definition be systems-focused and, as such, include connections within and among
36 entire watersheds and underlying aquifers. Different descriptors of connectivity drawn from the
37 literature on disturbance ecology (e.g., frequency, magnitude) might also be helpful. The SAB also
38 recommends expanding the discussion in the Report on approaches to measuring or otherwise
39 quantifying connectivity.

40
41 The SAB recommends that the conceptual framework in the Report be expressed as continuous physical,
42 hydrological (surface and subsurface), chemical, and biological flowpaths connecting watersheds. The
43 framework should illustrate the importance of climate, geology, and relief on flow and transport and
44 highlight the four-dimensional (longitudinal, lateral, vertical, and temporal) nature of connectivity. In
45 the Report, the EPA discusses connectivity within a classification system based on discrete landscape
46 settings (i.e., rivers and streams; waters and wetlands in floodplain settings; and waters and wetlands in
47 non-floodplain settings). The SAB recommends that this classification system be mapped onto the

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1 flowpath framework to show that continuous phenomena interact across these discrete landscape
2 settings. There should be more emphasis in the conceptual framework on the importance of groundwater
3 connectivity and biological connectivity. Additional layers of complexity also should be included in the
4 conceptual framework to reflect important issues such as spatial and temporal scales and human
5 alteration of the hydrological landscape.

6
7 In the conceptual framework, the EPA has classified waters and wetlands based on their potential to
8 have “bidirectional” or “unidirectional” hydrologic flows with rivers and lakes. Some “unidirectional”
9 wetlands are also called “geographically isolated wetlands.” However, the terms “bidirectional” and
10 “unidirectional” do not adequately describe the four-dimensional nature of connectivity and therefore
11 should be replaced with more commonly understood terms that are grounded in the peer-reviewed
12 literature (e.g., waters and wetlands in floodplain settings). The term “geographically isolated wetlands”
13 is misleading because all aquatic habitats have some degree of connection at some point in time.
14 Therefore, the SAB recommends that the EPA carefully define “geographically isolated wetlands” in
15 terms of the literature, explain that the term does not imply functional isolation, and then further explain
16 that “geographically isolated wetlands” will not be used as an organizational term in Report. In addition,
17 the SAB recommends that a summary and synthesis of the conceptual framework be added to the end of
18 Chapter 3 of the Report.

19
20 **Ephemeral, Intermittent, and Perennial Streams: Review of the Literature**

21
22 The SAB was asked to comment on whether the Report includes the most relevant literature on the
23 connectivity and effects of ephemeral, intermittent, and perennial streams and whether the literature has
24 been correctly summarized. The Report contains an extensive review of the scientific literature
25 describing the connectivity of streams to downstream waters. However, further discussion of the
26 literature on several specific topics is warranted. The Report should be expanded to include a more
27 complete discussion of temporal dynamics of connectivity of streams as well as the processes involved
28 in hydrologic exchange flows between main channels and off channel areas. The discussion of naturally
29 occurring chemical constituents, contaminants, contaminant transformation processes, and the influence
30 of stream temperature on downstream connectivity also should be expanded. In addition, the Report
31 should more thoroughly document the evidence that the biological integrity of headwater streams and
32 downstream waters is affected by the movement of biota throughout the lotic system. Other important
33 topics that should be further discussed include: the consequences of human alteration of headwater
34 streams; aggregate and cumulative effects of headwater streams on downstream waters; the effects of
35 streamside vegetation on stream ecosystems; the importance of reciprocal food-web linkages between
36 streams and their adjacent riparian areas; the role of groundwater and sediments in determining
37 connectivity, and the degree or strength of downstream connections.

38
39 **Ephemeral, Intermittent, and Perennial Streams: Review of the Findings and Conclusions**

40
41 The SAB was asked to comment on whether the conclusions and findings concerning the connectivity of
42 ephemeral, intermittent, and perennial streams are supported by the available science. The Report
43 concludes that streams exert a strong influence on the character and functioning of downstream waters
44 and that all tributary streams are physically, chemically, and biologically connected to downstream
45 waters. Strong scientific support has been provided for this overall conclusion and related findings. The
46 SAB notes that there is a gradient of connectivity that is a function of the frequency, magnitude, and
47 duration of physical, chemical, and biological processes. The SAB recommends that the conclusions and

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1 findings concerning ephemeral intermittent, and perennial streams be quantified when possible, related
2 to the four dimensions of connectivity (longitudinal, lateral, vertical, and temporal), and give more
3 attention to biogeochemical transformations and biological connections. In addition, some hydrologic
4 aspects of connectivity that are addressed in the Report require additional detail. These include
5 descriptions of key linkages and exchanges in tributary streams, such as groundwater-surface water
6 interactions, as well as the role of transition areas between uplands and headwaters. Likewise, the Report
7 should explain how hydrologic connectivity sustains both streams and aquifers, particularly in alluvial
8 systems in the Southwest and in karst systems in the eastern U.S. The EPA should also consider
9 summarizing and displaying the conclusions in the Report in matrix form with brief characterizations of
10 the temporal and spatial scales over which given functions or phenomena occur. Articulating the
11 rationale for choosing the specific case studies would also help ensure that the keys points are well
12 illustrated.

13
14 **Waters and Wetlands in Floodplain Settings: Review of the Literature**

15
16 The SAB was asked to comment on the whether the Report includes the most relevant literature on the
17 connectivity and effects of waters and wetlands in floodplain settings and whether the literature has been
18 correctly summarized. The SAB finds that the literature review does substantiate the conclusion that
19 floodplains and waters and wetlands in floodplain settings support the physical, chemical, and biological
20 integrity of downstream waters. That said, the literature review and synthesis on the connectivity and
21 downstream effects of waters and wetlands in floodplain settings is somewhat limited in scope (i.e.,
22 focused largely on headwater riparian wetlands). This section should be expanded to include the
23 following topics: channel migration zones (which demonstrate the variable nature of connectivity of
24 floodplains); the importance of lateral connections that create a diversity of habitats supporting a wide
25 array of species; and human impacts on connectivity. A more recent and diverse review of the
26 biogeochemical implications of exchange flow (including the literature on the role of wetlands and
27 floodplains as sources, sinks, and transformers of nutrients and other chemical contaminants) should
28 also be included in the Report. The SAB also recommends that the examples used in the Report be
29 broadened to make it more representative of the U.S. In particular, studies on peatlands in floodplain
30 settings and forested wetlands, including bottomland hardwoods, should be incorporated. In addition, the
31 functional role of floodplain systems in maintaining the ecological integrity of streams and rivers would
32 be clearer if the literature on floodplain wetlands were reorganized. The text on low-order riparian areas
33 and the role of headwater, streamside areas on in-stream structure and function could be moved to the
34 chapter of the Report that addresses ephemeral, intermittent, and perennial streams. The term
35 “bidirectional wetlands” should be replaced with the term “waters and wetlands in floodplain settings”
36 to reflect landscape position. The Report should also more explicitly discuss how floodplain
37 environments are intimately linked to river systems both spatially and temporally by means of the flood
38 pulse. In this regard, the importance of the short duration high intensity and long duration low intensity
39 events should be compared and contrasted. In addition, the Report should emphasize the effects of
40 floodplains not only on river flows, but also on hydrological connections and processes affecting biota,
41 chemistry, and sediment movement through downstream as well as lateral, vertical and temporal
42 dimensions.

43
44 **Waters and Wetlands in Floodplain Settings: Review of the Findings and Conclusions**

45
46 The SAB was asked to comment on whether the conclusions and findings concerning the connectivity of
47 waters and wetlands in floodplain settings are supported by the available science. The Report concludes

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1 that “bidirectional” wetlands and waters in floodplain settings are physically, chemically, and
2 biologically connected with rivers through multiple pathways. There is strong scientific support for this
3 overall conclusion. However, additional literature could be included in the Report to bolster the
4 conclusion and the related findings. Many of the conclusions and findings concerning waters and
5 wetlands in floodplain settings are drawn from literature related to non-floodplain riparian zones (i.e.,
6 headwater riparian zones).

7
8 A discussion of river-floodplain systems as integrated ecological units would be a useful addition to the
9 Report, and the science of larger river (i.e., high-order) floodplain systems is a good starting point. The
10 discussion of the findings and conclusions concerning waters and wetlands in floodplain settings should
11 further address a number of other issues including: the temporal dimension of connectivity of these
12 waters and wetlands; the role of these waters and wetlands in storing and transforming chemical
13 constituents; the role of biological connectivity (including food webs), quantification of groundwater
14 linkages, the effects of human alteration of connectivity; and the importance of considering
15 aggregate/cumulative downstream effects of these waters and wetlands. In addition, the SAB
16 recommends that the conclusions be more empirically and/or specifically described and that consistent
17 terminology be used throughout the report to describe floodplain wetlands.

18
19 **Waters and Wetlands in Non-floodplain Settings: Review of the Literature**

20
21 The SAB was asked to comment on whether the Report includes the most relevant literature on the
22 connectivity and effects of waters and wetlands in non-floodplain settings and whether the literature has
23 been correctly summarized. In general, the EPA’s review and synthesis of the literature on the
24 downstream connectivity and effects of wetlands and waters in non-floodplain settings is thorough and
25 technically accurate. The SAB recommends that the EPA consider reviewing and adding some
26 additional literature. In particular, the SAB recommends reviewing publications that analyze bulk
27 exchange of materials by biota, movement of nutrients by biota, introduction of disease vectors, and the
28 provisioning of habitat essential for biological integrity and completion of life cycles of downstream
29 species. The term “unidirectional wetlands” as used in the report is misleading because it implies one-
30 way hydrologic flows when, in fact, connectivity can have many spatial and temporal dimensions. The
31 SAB recommends that the terms “unidirectional” and “geographically isolated” waters and wetlands be
32 replaced in the report with the term “non-floodplain waters and wetlands.” The SAB also recommends
33 that the EPA frame the discussion about the temporal and spatial scales and gradients of various
34 connections between and among floodplain wetlands and non-floodplain wetlands and downstream
35 waters by considering the magnitude, duration and frequency of connectivity pathways. The Report
36 should also recognize that all aquatic habitats have some degree of connection, although such
37 connections may not be relevant if they do not have important effects on the physical, chemical, and/or
38 biological integrity of downstream waters. In addition, the Report should discuss the importance of
39 assessing wetland connectivity and connectivity pathways in terms of aggregated wetland complexes
40 and the legacy effects of human disturbances.

41
42 **Waters and Wetlands in Non-floodplain Settings: Review of the Findings and Conclusions**

43
44 The SAB was asked to comment on whether the conclusions and findings concerning the connectivity of
45 waters and wetlands in non-floodplain settings are supported by the available science. The Report
46 concludes that the literature reviewed does not provide sufficient information to evaluate or generalize
47 about the degree of connectivity (absolute or relative) or the downstream effects of wetlands in non-

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1 floodplain settings. The SAB disagrees with this overall conclusion. To the contrary, the SAB finds that
2 the scientific literature provides ample information to support a more definitive statement (i.e.,
3 numerous functions of “unidirectional” wetlands have been shown to benefit the physical, chemical, and
4 biological integrity of downgradient waters) and recommends that the EPA revise the conclusion to
5 focus on what is supported by the scientific literature and articulate the specific knowledge gaps that
6 must be resolved (e.g., degree of connectivity, analyses of temporal or spatial variability). The SAB also
7 recommends that the Report explicitly discuss the pathways by which non-floodplain wetlands can be
8 connected to downstream waters and state that the evaluation of connectivity should be based on the
9 magnitude, duration, and frequency of water, material, and biotic fluxes to downstream waters and their
10 impact on the physical, chemical, and/or biological integrity of those waters.

11
12 The SAB recommends several revisions to improve the findings concerning “unidirectional” waters and
13 wetlands. Reference to specific studies should be synthesized rather than individually reported, as they
14 are intended to summarize general themes arising from the diverse literature. The key findings should be
15 more explicitly presented and clearly explained in the text of the Report. In addition, the key findings
16 should address: the biological functions and biological connectivity of non-floodplain wetlands,
17 differences between natural and manmade wetlands, the importance of spatial proximity as a
18 determinant of connectivity, and the importance of cumulative or aggregate impacts of non-floodplain
19 wetlands.
20

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2. INTRODUCTION

The National Center for Environmental Assessment in the EPA Office of Research and Development (ORD) has developed a draft report titled *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence (September 2013 External Review Draft)*. The draft report (hereafter referred to as the “Report”) is a review and synthesis of the peer-reviewed scientific literature on the connectivity or isolation of streams and wetlands relative to large water bodies such as rivers, lakes, estuaries, and oceans. The purpose of the Report is to summarize the current understanding of these connections, the factors that influence them and the mechanisms by which connected waters affect the function or condition of downstream waters. The Report was developed to inform an EPA and U.S. Army Corps of Engineers rulemaking on waters that are under the jurisdiction of the Clean Water Act. The Report is a scientific review and, as such, it does not set forth legal standards for Clean Water Act jurisdiction.

The literature review and synthesis in the Report focus on describing: (1) a conceptual framework that represents the hydrologic elements of a watershed, the types of physical, chemical, and biological connections that link them, and the watershed climatic factors that influence connectivity at various spatial and temporal scales; (2) the downstream connectivity and effects of ephemeral, intermittent, and perennial streams; (3) the downstream connectivity and effects of waters and wetlands in riparian/floodplain settings; and (4) the downstream connectivity and effects of waters and wetlands in non-riparian/non-floodplain settings. Six case studies from the literature are included in the report to illustrate the connectivity of water bodies in different landscape settings and geographic regions.

The EPA asked the SAB to review the Report and comment on: the clarity and technical accuracy of the document, whether it includes the most relevant peer-reviewed literature, whether the literature has been correctly summarized, and whether the findings and conclusions in the Report are supported by the available science. In response to the EPA’s request, the SAB convened an expert panel to conduct the review. The Panel held a public meeting on December 16-18, 2013 and teleconference meetings on April 28, May 2, and June 19, 2014 to deliberate on the charge questions and develop a consensus report. The Panel’s draft report was reviewed and discussed by the chartered SAB at a teleconference on [insert date]. This report provides the findings and recommendations of the SAB in response to the charge questions in Appendix A. The SAB recommendations are highlighted at the end of each section of this report.

3. RESPONSES TO EPA’S CHARGE QUESTIONS

3.1. Overall Clarity and Technical Accuracy of the Draft Report

Charge Question 1. Please provide your overall impressions of the clarity and technical accuracy of the draft EPA Report, “Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence.”

The EPA’s Report is an extensive review of the literature that is generally thorough and technically accurate. That said, the Report could be improved with additional effort to: (1) ensure consistency and continuity in style and organization throughout the document; (2) improve the usefulness of the document to decision-makers; (3) strengthen the literature review in several key places; (4) provide further detail and clarification of concepts in some parts of the document; and (5) restructure the case studies. Each of these points is discussed below.

3.1.1 Style and Organization of the Draft Report

There are stylistic differences among the chapters of the Report, and the writing needs to be reworked for consistency and continuity so that it is written in a single voice. There also is a strong need to check for consistent use of terms and definitions among the chapters, subchapter sections, and the glossary. Caution should be exercised when using words that may denote particular legal or regulatory meanings (e.g., significant, adjacent). The Report is quite long and can be repetitive in places, with the main points easily lost in the volume of material presented. Superfluous or redundant information should be removed, being careful that only concise text supporting the key findings is included. A technical editor could provide great support for this process.

Several organizational changes will improve the readability of the Report. First, each section of the Report should be clearly linked to and consistent with the conceptual framework. Second, each paragraph and/or subsection of the Report should have parallel structure where main points are clearly articulated at the end – perhaps even in bold or underlined text. Third, key points should be stated simply and directly at the end of each chapter. Fourth, the authors should consider including in the executive summary a succinct table that summarizes the key findings and levels of certainty of each finding within the Report. The report of the Intergovernmental Panel on Climate Change (IPCC 2007) is an excellent model for this approach.

Recommendations

- The Report should be edited to ensure that it is written in a consistent style and single voice and each section should be clearly linked to the conceptual framework.
- Terms and definitions should be used consistently throughout the Report and caution should be exercised when using words that may have legal or regulatory meanings.
- Key points should be clearly stated at the end of each chapter and the EPA should consider including in the Executive Summary a succinct table summarizing the key findings and level of certainty associated with each.

1
2 **3.1.2. Improving the Usefulness of the Report to Decision-Makers**
3

4 Although the Report is a science, not policy, document, the SAB is aware that it was written to support
5 the EPA’s efforts to clarify the jurisdiction of the Clean Water Act. As such, the Report could be written
6 in a more strategic manner that provides greater insight on complex or nuanced issues to be addressed in
7 evaluating connectivity. For example, throughout the Report there could be greater focus on the
8 literature that addresses various aspects of quantifying the magnitude, frequency, or consequences of
9 connectivity. The authors might consider an approach similar to that used in the report of the
10 Intergovernmental Panel on Climate Change (IPCC 2007), which would provide an estimate of the
11 relative certainty of connectivity or an effect. As written, the Report uses language that often suggests
12 that connectivity is a binary property – something either present or absent, rather than a gradient. As
13 noted in the many public comments to the SAB, the binary perspective in the Report implies that any
14 connectivity must significantly affect the biological, physical, or chemical integrity of downstream¹
15 waters. Although certain systems, such as headwater streams and tributaries and floodplain wetlands are
16 known to exhibit a level of connectivity that is ecologically meaningful even at the lower end of the
17 gradient, the frequency, duration, predictability, and magnitude of connectivity will ultimately determine
18 the consequences to downstream waters.
19

20 The SAB also finds that the Report would be strengthened if it contained: 1) an additional review of the
21 scientific literature that quantifies the frequency, duration, predictability, and magnitude of hydrologic,
22 chemical, and biological connections for each type of “water” and consequences of that connectivity for
23 the physical, chemical, and biological integrity of downstream waters, with key uncertainties made
24 explicit and 2) a more explicit discussion of the cumulative effects of streams and wetlands on
25 downstream waters (i.e., multiple streams and/or wetlands considered in “aggregate”) and discuss the
26 spatial and temporal scales at which the functional aggregation should be evaluated.
27

28 *Recommendations*
29

- 30 • As further discussed in Section 3.8.1 of this report, the SAB recommends that the interpretation of
31 connectivity be revised so as not to sound like a binary, categorical distinction (connected versus not
32 connected) but rather a gradient whereby the consequences to downstream waters are determined by
33 the frequency, duration, predictability, and magnitude of connections.
34
- 35 • The Report should explain how the definitions used for rivers, streams, and wetlands differ from
36 those in the Clean Water Act and associated regulations and discuss any implications this might have
37 for interpreting the conclusions.
38
39
40
41

¹ In this SAB report, the term “downstream” is used to refer broadly to connectivity that is both downstream and downgradient. All water (e.g., surface water, hyporheic flows, and groundwater) flows downgradient toward lesser hydraulic head than at the point of origin or point of interest. For most surface water flows, downgradient is also downstream. Sometimes the term “downgradient” is used in this report to emphasize instances where hyporheic and groundwater flows are especially important.

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1 **3.1.3. Strengthening the Literature Review**
2

3 The literature review in the Report can be strengthened by clarifying what was considered as peer-
4 reviewed literature, the kinds of evidence used to support the findings and conclusions in the Report, and
5 the number and types of studies selected for review. The approach used for screening, compiling, and
6 synthesizing information should be made explicit. In particular, the “weight of evidence” approach used
7 to evaluate multiple references should be described in more detail. The extent to which an exhaustive
8 literature review was performed should be clearly stated in the Report. The SAB has provided numerous
9 additional references and other references have been suggested in written comments from the public.

10
11 The SAB also finds that the EPA could better highlight gaps in our understanding of certain wetland and
12 stream systems and/or geographic areas by including in the Report a table that shows the distribution of
13 the scientific literature for various regions of the United States.

14
15 *Recommendations*
16

- 17 • The literature review in the Report should clearly describe the approach used to screen, compile, and
18 synthesize the information and indicate: (1) what was considered to be peer reviewed literature; (2)
19 the kinds of evidence used to support the findings and conclusions; and (3) the number and types of
20 studies selected for review.
- 21
22 • EPA should consider including in the Report additional information from references provided by the
23 SAB and members of the public.

24
25 **3.1.4. Additional Detail and Clarification of Text Needed in the Report**
26

27 As further discussed in other sections of this SAB report, the following topics in the EPA Report need
28 clarification and/or additional detailed information:
29

- 30 - *The importance and relevance of different spatial and temporal scales.* For example, what is the
31 relevant spatial and temporal scale for assessing connectivity in different water systems? At
32 which scales are wetlands functionally aggregated? Understanding the spatial and temporal
33 scales at which connectivity affects the physical, chemical, and biological integrity of
34 downstream waters is central to evaluating and predicting connectivity and its consequences.
35 The relevant scale of connectivity may be clarified by considering the most important
36 consequences or problems over particular time and spatial scales. Ultimately, these scales
37 determine how policy makers will deal with connectivity within the context of the Clean Water
38 Act.
- 39
40 - *The extent to which biological connections among water systems affect the integrity of*
41 *downstream waters.* Birds, mammals, and other fauna (e.g., salamanders), can be important
42 sources of material transfers to, and also critical sources of, organisms necessary to support
43 viable populations in downstream waters. Biological connectivity should be evaluated across
44 complete annual and full life cycles, as well as through food web interactions. Literature
45 references concerning biological connectivity are provided in Appendix B and in other sections
46 of this report.
47

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- 1 – *The necessity of adopting watershed, riverscape, and groundwater basin perspectives to*
2 *understand connectivity.* Viewing systems as part of these larger basins, riverscapes and
3 watersheds permits a greater understanding of interactions and feedbacks with floodplain and
4 riparian vegetation, groundwater and subsurface waters, and other surface water features that can
5 ultimately impact downstream waters.
- 6
- 7 – *The importance of considering water bodies in aggregate (e.g., populations of tributaries and*
8 *populations of floodplains, floodplain wetlands and non-floodplain wetlands) for evaluations of*
9 *connectivity.*
- 10
- 11 – *The role of ground water, sediments, and chemical and biological parameters in establishing*
12 *connectivity of water bodies.*
- 13
- 14 – *Human modifications and the ways that they affect connectivity.* Modifications that could affect
15 connectivity in ways that impact downstream waters can include directly eliminating, restoring,
16 or altering connectivity via roads, agricultural tiles, dams, pumping ground water, irrigation,
17 channelization, and other manmade infrastructure (piped streams, stormwater pipes). Certain
18 systems, such as effluent-dependent waters, are more closely tied to human modifications than
19 others. Functions associated with these man-altered systems and their natural counterparts should
20 be evaluated using the scientific literature.
- 21
- 22 – *Approaches to assess or measure connectivity.* It would be useful to provide examples of the
23 various dimensions of connectivity that are most appropriately quantified, ways to construct
24 connectivity metrics (e.g., retrospective or prospective analyses, model simulations, spatial
25 analyses), and the most needed scientific, methodological, and technical advances in order to
26 understand and estimate connectivity.
- 27

28 **3.1.5. Restructuring the Case Studies**

29
30 The SAB finds that the case studies in the Report provide helpful illustrations of connectivity between
31 downstream waters and geographically specific types of systems. That said, case studies could be even
32 more helpful if they were selected and organized to illustrate different points along the gradient of
33 connectivity (i.e., less to more connected) and of different types of water bodies, including at least one
34 where intermittent connectivity is important. The case studies also could be used to compare geographic
35 regions, such as Southwest arid, Midwest mesic, and arctic permafrost systems. As discussed in Section
36 3.2.5 of this report, comparisons among geographic regions could be accomplished by using climate,
37 geology, and relief, which vary regionally and which form the basis of the concept of Hydrologic-
38 Landscape Regions (i.e., HLRs), as a framework for the case studies.

39
40 An alternative structure would be to present the case studies as brief textboxes that clearly and simply
41 articulate key points. Within these textboxes the expanded versions could be referenced and included in
42 appendices, if deemed necessary. The rationale for selecting different case studies and the key points
43 being illustrated by each should be explicitly stated early in the text. If expanded in the appendices, each
44 case study could have a conceptual model diagram showing the surface and subsurface flowpaths
45 illustrating the connectivity between/among systems. As further discussed in Sections 3.3.9 and 3.5.6 of
46 this report, it would be useful to include case studies representing a greater range of geographic regions
47 (e.g., arctic) and systems, including human-modified systems, forested wetlands, and bottomland forests.

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Recommendations

- The rationale for selecting different case studies and the key points illustrated in each should be clearly stated early in the text.
- The EPA should consider distilling case studies into brief summaries constrained to text boxes that: (1) provide shorter, clear illustrations of where different systems sit along the gradients of connectivity, and (2) highlight differences in the ecologically relevant temporal and spatial scales. The reader should be able to see how the case studies fit within the conceptual framework. If expanded case studies are desired, these should be presented in the appendices.
- The EPA should consider including in the Report case studies of a greater range of geographic regions (e.g., arctic) and systems, including human modified systems, forested wetlands, and bottomland forests.

3.2. Conceptual Framework: An Integrated, Systems Perspective of Watershed Structure and Function

Charge Question 2. Chapter 3 of the draft Report presents the conceptual basis for describing the hydrologic elements of a watershed; the types of physical, chemical, and biological connections that link these elements, and watershed climatic factors that influence connectivity at various temporal and spatial scales (e.g., see Figure 3-1 and Table 3-1). Please comment on the clarity and technical accuracy of this Chapter and its usefulness in providing context for interpreting the evidence about individual watershed components presented in the Report.

The SAB finds that the literature review in Chapter 3 of the Report is technically accurate, and readable. The literature review generally does not need to be changed, although it could be strengthened with technical editing. However, the conceptual framework needs to be revised and clearly articulated at the beginning of the Chapter. As further discussed below, the SAB finds that the following revisions are needed to improve the clarity, accuracy, and usefulness of the conceptual framework in the Report: (1) connectivity should be clearly defined at the beginning of Chapter 3; (2) the scope of the Report (i.e., the types of waters and wetlands covered) should be clearly defined at the beginning of Chapter 3; (3) the conceptual framework should be expressed as hydrological, chemical, and biological flowpaths; (4) certain terms (e.g., “unidirectional” and “bidirectional”) used in the Report should be replaced with more commonly understood terminology that is grounded in the peer-reviewed literature; (5) additional layers of complexity (including a functional framework, spatial and temporal scales, the influence of human activities, the use of Hydrologic Landscape Regions, aggregate and cumulative effects, and map resolution) should be represented in the conceptual model in the Report; and (6) a summary and synthesis of the conceptual model should be added at the end of Chapter 3.

3.2.1. Defining Connectivity and Isolation

Because connectivity and isolation can be defined in many ways, the Report needs to define and concisely discuss what is meant by both “connectivity” and “isolation” at the beginning of Chapter 3. Currently, only connectivity is defined, and it is not defined until page 3-28, long after much of the conceptual framework has been presented and discussed. The definition of connectivity also should be

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1 extended to the entire landscape (i.e., not just to waters and wetlands but to entire watersheds and
2 underlying aquifers) through a broader vision of local- to landscape-scale physical, chemical, and
3 biological exchanges. The definition and discussion of connectivity at the beginning of Chapter 3 could
4 be brief, with the many details and nuances to be addressed later.

5
6 The definition of connectivity used in the Report seems to follow that of Pringle (2001; 2003); i.e., the
7 transfer of matter, energy, and/or organisms within or between elements of the landscape. The Report
8 should state that connectivity is a scalable quantity ranging continuously from fully connected to
9 completely isolated, rather than a binary condition of either connected or isolated. This could be
10 expressed in a simple conceptual figure here, then again as more specific figures in chapters on each
11 water and wetland type covered in the Report. (See, for example, Figure 3 in Section 3.7.3 of this report
12 for an example developed for waters and wetlands in non-riparian/non-floodplain settings.)

13
14 Defining connectivity as discussed above creates a problem with the related definition of isolation. If
15 connectivity really is the transfer of matter, energy, and/or organisms within or between elements of the
16 landscape, and connectivity really is a scalable quantity ranging from fully connected to fully isolated,
17 then one might infer that true isolation doesn't occur until there is absolutely no transfer of matter,
18 energy, and/or organisms within or between elements of the landscape. This condition might be so rare
19 as to be negligible, rendering the term isolation almost useless.

20
21 The definitions of connectivity and isolation might be improved by drawing upon the literature on
22 disturbance ecology (see Stanley et al. 2010 and references therein). In that literature, a disturbance is
23 seen as a discrete event that disrupts ecosystem structure and function, substantively changing the
24 physical, chemical, and/or biological environment. Such disturbances are commonly viewed through a
25 filter of the biological consequences, i.e., does the disturbance event matter to biota? However, to
26 facilitate objective comparisons among events, such disturbances are nevertheless commonly quantified
27 in terms of physical measures of the disturbance itself (e.g., frequency, magnitude, duration) rather than
28 in terms of the biological response to the disturbance. Predictability is often part of this definition, with
29 the stipulation that disturbances must be outside of some normal range to which biota are typically
30 adapted (e.g., Resh et al. 1988; Poff 1992). By adding these details, connectivity and isolation could be
31 viewed conceptually along a continuum ranging from fully connected to completely isolated, with a
32 transition somewhere in between that varies case-by-case and is defined by whether or not a perturbation
33 is outside the normal range and relevant to the biota.

34
35 *Recommendations*

- 36
- 37 • Connectivity and isolation should be defined and discussed at the beginning of Chapter 3 of the
38 Report.
 - 39
 - 40 • The definition of connectivity in the Report should be extended to the entire landscape through a
41 broad vision of local- to landscape-scale physical, chemical, and biological exchanges.
 - 42
 - 43 • The definition of connectivity and isolation could be improved by connecting to literature on
44 disturbance ecology.
 - 45
 - 46
 - 47

3.2.2. Measuring or Otherwise Quantifying Connectivity

The Report should discuss approaches to measuring or otherwise quantifying connectivity. Such approaches should recognize that connectivity is, in part, determined by the extent to which the consequences from impacts on one water body will affect chemical, physical, and/or biological integrity of downstream waters. In addition, multiple dimensions of connectivity should be described, notably, as sources and mechanisms of transport and transformation (i.e., fluxes of water, material, biota) and associated ecological functions (e.g., lag, refuge, and transformation) which are made manifest along multiple flowpaths (e.g., via surface water, the hyporheic zone, and ground water). Such approaches also should note that these dimensions should be assessed at spatial and temporal scales that permit evaluation of the cumulative effects of connectivity over time and the aggregate effects of connectivity over space. Therefore, the EPA should consider expanding the brief overview of approaches to measuring connectivity that is provided on pages 6-6 and 6-7 of the Report. This expansion would be most useful if it provided examples of the various dimensions of connectivity that are most appropriately quantified, ways to construct connectivity metrics (e.g., retrospective or prospective analyses, model simulations, spatial analyses), and the most needed methodological and technical advances.

Insights from Hydrologic Systems

Future efforts to quantify connectivity can be informed by the wide variety of conceptual models and quantitative tools that have been developed to evaluate the connectivity of both surface and subsurface hydrological systems in different settings, including non-floodplain wetlands. The standard approach involves first characterizing the surface and subsurface elements of landscapes. Important elements include climate, geology, and relief, and the amount, distribution and types of waters and wetlands. These elements can then be integrated to create a flowpath network that describes connectivity (ASTM 1996; Kolm et al. 1996; Heath 1983; Winter et al. 1998). This approach has been extended to biological connectivity and HGM wetland classifications (e.g., Kolm et al. 1998). Of course, the approach to quantifying hydrologic connectivity is not identical across systems, and careful attention must be given to identifying the most appropriate techniques (Healy et al. 2007) and metrics (Ali and Roy 2010).

Other examples can be found in the literature related to water quantity and quality modeling (Appel and Reilly, 1994; Sun et al. 1997; Cunningham and Schalk 2011; Parkhurst et al. 2010; Harbaugh 2005), and integrated surface water ground water modeling (Markstrom et al. 2008; Ely and Kahle 2012; Huntington and Niswonger 2012; Woolfenden and Nishikawa 2014), sediment transport modeling (McDonald et al. 2005; Nelson et al. 2003), and watershed and biological/habitat/landscape modeling (Kinzel et al. 2005; Hunt et al. 2013). Approaches have also been developed to quantify linkages due to ground water movement and storage (Heath 1983) and the effects of “flood pulses” (Kolm et al. 1998). Likewise, the role of chemical movement and storage to ground water systems in floodplains has been quantified by flow and transport modeling (Winter et al. 1998, Markstrom et al. 2008; Woolfenden and Nishikawa 2014) as well as with steady-state and transient analyses that simulate temporal changes (Appel and Reilly 1994; Winter et al. 1998; Harbaugh 2005; Conaway and Moran 2004; McDonald et al. 2005; Nelson et al. 2003; Markstrom et al. 2008; Huntington and Niswonger 2012).

A growing number of studies are using graph-theory based indices of connectivity to better understand aquatic systems. For example, the Integral Index of Connectivity was successfully used by Van Looy et al. (2013) to quantify connectivity and habitat availability in a dendritic river network across varying spatial scales. Wainwright et al. (2011) demonstrated how responses of river systems to vegetation

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1 removal, runoff, and erosion were better predicted by measures of structural and functional connectivity.
2 Recent advances have allowed better integration of hydrological and ecological connectivity using the
3 Directional Connectivity Index and connectivity-orientation curves, which effectively quantified
4 physical-biological feedbacks in the Everglades (Larsen et al. 2012). Malvadkar et al. (2014) recently
5 examined numerous metrics drawn from graph theory, including Betweenness Centrality, Integral Index
6 of Connectivity, Coincidence Probability, Eigenvector Centrality, Probability of Connectivity, and
7 Influx Potential.

8
9 *Insights from Disturbance Ecology*

10
11 In many respects connectivity can be described using concepts borrowed from disturbance ecology –
12 frequency, magnitude, timing, duration, rate of change, and predictability (e.g., Resh et al. 1988; Poff
13 1992; Poff et al 1997). Frequency is inversely related to magnitude, and describes how often a flow
14 exceeding a particular magnitude recurs over a specified time period. Magnitude is the rate of flow
15 moving past a fixed location. Duration is the time period associated with a specific condition, either in
16 terms of a specific flow event (e.g., number of days inundated by a specific flood event) or over a time
17 period (e.g., number of days inundated in a year).

18
19 The temporal and spatial predictability of connectivity should be an especially important attribute to
20 quantify when assessing potential for downgradient effects in systems without permanent or continuous
21 flowpaths (e.g., Poff and Ward 1989; Lytle and Poff 2004; Poff et al. 2006). Predictability refers to the
22 regularity at which certain flows occur. Some mechanisms of connectivity are predictable (e.g.,
23 migration of anadromous fish and waterfowl, spring flood pulses and late summer low flows, seasonal
24 peaks of aquatic insect emergence), whereas others are less so (e.g., flood events from storms, short-
25 term and/or stochastic movement of organisms, nutrient spiraling dynamics). Predictable events can
26 profoundly shape systems. For example, sequential and predictable seasonal flooding and drying events
27 over an annual cycle are formative processes of physical, chemical, and biological attributes of streams
28 in Mediterranean biomes, including parts of the western U.S. (Gasith and Resh 1999). Large seasonal
29 waterfowl migrations can move nutrients, plants (seeds), and invertebrates between wetlands and
30 downgradient waters (e.g., Figuerola et al. 2003; Green et al. 2008). A predictability axis could be
31 folded into the current “gradient of connectivity” framework suggested by the SAB (Figure 3 in Section
32 3.7.3 of this report)

33
34 *Recommendations*

- 35
36 • The Report should discuss approaches to measuring or otherwise quantifying connectivity. The
37 Report could do so by expanding the brief overview of approaches to measuring connectivity that is
38 provided on pages 6-6 and 6-7 of the Report.
39
40 • Approaches to measuring or otherwise quantifying connectivity should be drawn from both the
41 hydrological and disturbance ecology literature.

42
43 **3.2.3. Defining the Scope of the Report**

44
45 The SAB finds that the scope of the Report, with respect to the types of waters and wetlands covered,
46 needs to be clearly defined and discussed at the beginning of Chapter 3. As a synthesis of the scientific
47 literature, the Report appropriately includes discussion of the relevant literature on hydrologic, climatic,

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1 and other processes that occur across landscapes to connect various waters and wetlands. The breadth of
2 the literature discussed in the Report need not be constrained by regulatory definitions of waters and
3 wetlands. However, the SAB notes that a primary use of the Report is to assess connectivity among
4 waters and wetlands and downgradient waters. As currently written, the Report is not clear about the
5 degree to which its definitions of waters and wetlands include broader portions of the landscape (e.g.,
6 whether wetlands or rivers include their floodplains). The Report uses the water and wetland definition
7 of Cowardin et al. (1979), and many public commenters have expressed concern about the potential
8 expansion of the scope of jurisdiction of the underlying Clean Water Act – from “three-parameter²” to
9 “one-parameter” waters and wetlands. These confusions and concerns could be explicitly addressed in a
10 separate section outlining the scope of the Report immediately after the section defining connectivity.
11 The Report should discuss the functional role of floodplains and riparian areas regardless of their
12 regulatory status. However, it should be made clear that this discussion does not imply an expansion of
13 the definition of waters and wetlands under the jurisdiction of the Clean Water Act. The SAB recognizes
14 that the Report is a scientific and not a policy document, but finds that ignoring this distinction only
15 serves to create unnecessary confusion and concern among the readership.

16
17 *Recommendations*

- 18
19 • The scope of the Report should be clearly delineated, with special attention paid to clearly defining
20 the types of wetlands and water bodies covered.
- 21
22 • The Report should consider the functional role of floodplains and riparian areas irrespective of their
23 classification as waters and wetlands under the Clean Water Act (see discussion in Section 3.5.2 of
24 this report).

25
26 **3.2.4. Revising and Defining the Terminology Used in the Report**

27
28 With regard to the discrete categories of systems discussed in the Report (i.e., rivers and streams, waters
29 and wetlands in riparian/floodplain settings, and waters and wetlands in non-riparian non-floodplain
30 settings), the SAB finds that “bidirectional” and “unidirectional” are misleading terms. The Report uses
31 these terms to describe wetlands and open waters with: (1) the potential for non-tidal, “bidirectional”
32 hydrologic flows with rivers and lakes; or (2) the potential for “unidirectional” hydrologic flows to
33 rivers and lakes. As previously noted, the four-dimensional nature of connectivity (longitudinal, lateral,
34 vertical, and temporal) is a foundational aspect of freshwater ecology (e.g., Ward 1989). “Bidirectional”
35 and “unidirectional” hydrologic flow certainly describe a key difference among wetland and open water
36 systems. Indeed, in some landscape settings, there are two-way fluxes of water and water-borne
37 materials between the landscape and the rivers and streams, while in other landscape settings, there are
38 only one-way fluxes of water and water-borne materials from the landscape to the rivers and streams.
39 Although this is an important difference, it does not adequately characterize the four-dimensional fluxes
40 in both landscapes. The key difference in the respective settings is landscape position, with some waters
41 and wetlands having flood-pulse exchanges with rivers and streams and other waters and wetlands not
42 having flood-pulse exchanges with rivers and streams. Therefore, the SAB recommends that these terms

² The “one parameter” wetland classification system (Cowardin et al., 1979) classifies an area as a wetland if it has one or more of the following three attributes: (1) the area supports predominantly hydrophytes at least periodically; (2) the land has substrate that is predominantly undrained hydric soil; or (3) the land has nonsoil substrate that is saturated with water or covered by shallow water at some time during the growing season of each year. The “three parameter” classification system (33CFR 328.3(b); USACE 1987) requires that an area have all three of these attributes to be classified as a wetland.

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1 be changed to terms from a commonly understood classification system that is grounded in the literature.
2 This is important not only for communication purposes but also because it is consistent with the peer-
3 reviewed, literature-based focus of the Report. One possibility is that “bidirectional” wetlands could be
4 called *waters and wetlands in floodplain settings* and “unidirectional” wetlands could be called *waters*
5 *and wetlands in non-floodplain settings*. These terms will be used throughout this report.
6

7 Use of the term “geographically isolated wetlands” by itself in the Report is problematic in that
8 “geographically isolated wetlands” technically mean “wetlands isolated in space.” However,
9 “geographically isolated wetlands” are defined in the Report to mean “wetlands surrounded by uplands.”
10 These are very different definitions. The SAB acknowledges that the term “geographically isolated
11 wetlands” has been established in the literature, and is commonly used (e.g., Tiner 2003b; 2003c).
12 However, in the flowpath framework recommended by the SAB, there are no truly isolated waters or
13 wetlands. As discussed in other sections of this SAB report, all waters and wetlands are connected,
14 differing only in the degree of connection (e.g., frequency, magnitude, timing, duration) and the degree
15 to which those connections affect the chemical, physical, and biological integrity of downstream waters.
16 Therefore, the term “geographically isolated wetlands” runs counter to the continuous flowpath
17 conceptual framework recommended by the SAB. A final point is that the term “geographically isolated
18 wetlands” does not even fit into the current conceptual framework in the Report because the Report
19 explicitly states that geographically isolated wetlands can occur in both riparian/floodplain settings and
20 non-riparian/non-floodplain settings. The SAB therefore recommends that the EPA carefully define
21 “geographically isolated wetlands” in terms of the literature, explain that the term “geographically
22 isolated wetlands” was never meant to imply functional isolation, and then further explain that
23 “geographically isolated wetlands” will not be used as an organizational term in Report. The SAB
24 further recommends that the EPA then remove the term from later sections of the Report or, at the very
25 least, ensure that the term is used consistently and not interchangeably with other terms, as it has been
26 on occasion in the section of the Report on “unidirectional” wetlands.
27

28 EPA should consider defining and adding the term “interrupted stream” to its discussion of stream
29 categories (e.g., Meinzer 1923; Hall and Steidl 2007). Interrupted streams are those that change from
30 ephemeral, intermittent or perennial streams for ecologically distinct reaches. Such streams are common
31 when geological conditions (i.e., change in substrate, faulting) create rapid changes in aquifer-to-stream
32 recharge/discharge (e.g., the San Pedro River or many streams in volcanic terrains such as the Snake
33 River Plain, Columbia Basin, or Hawaiian Islands). Human interaction (ground water pumping,
34 wastewater discharge) also can create interrupted streams (Rio Grande, Santa Ana River, South Platte
35 River). Connectivity across such interrupted reaches can radically shift, with concomitant alteration in
36 habitat or impact when connection is reestablished. Although EPA may consider such streams
37 “connected,” there may be no clear stream bank and bed preserved across the reach and it may be
38 difficult to quantify the ecological importance of the connection.
39

40 *Recommendations*

- 41
- 42 • The terms “bidirectional” and “unidirectional” should be replaced in the Report with more
43 commonly understood terms that are grounded in the peer-reviewed literature. The SAB
44 recommends that “bidirectional” wetlands be called “waters and wetlands in floodplain settings” and
45 “unidirectional” wetlands be called “waters and wetlands in non-floodplain settings.”
46

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- 1 • The term “geographically isolated wetlands” is misleading because it implies functional isolation
2 and does not directly map onto the organizational terminology in the Report. The EPA should draw
3 upon the literature to carefully define “geographically isolated wetlands,” explain that the term does
4 not imply functional isolation, and then further explain that “geographically isolated wetlands” will
5 not be used as an organizational term in Report.
6
- 7 • The term ‘interrupted stream’ should be defined and used in the discussion of streams where flow is
8 impeded or reduced on the reach scale.
9

10 **3.2.5. Use of a Flowpath Framework**

11
12 Chapter 3 of the Report contains detailed information about river system characteristics, the effects of
13 streams and wetlands on downstream waters, and factors influencing connectivity. However, the
14 Chapter lacks an explicit conceptual framework, which makes it difficult to categorize and organize this
15 detailed information. Thus, the SAB recommends that a conceptual framework be established and
16 discussed at the beginning of Chapter 3. This conceptual framework could be expressed as continuous
17 hydrological (surface and subsurface), chemical, and biological flowpaths connecting watersheds from
18 “ridge to reef,” and therefore connecting waters and wetlands to downgradient waters. The flowpath
19 framework should highlight the four-dimensional nature of connectivity, because four-dimensional
20 connectivity scaled in a habitat to catchment context is a foundational aspect of freshwater ecology (e.g.,
21 Ward 1989). The flux and transformation of water, materials, and organisms – which fundamentally
22 control the integrity of downgradient freshwater ecosystems – occur at varying rates primarily
23 determined by climate, geology, relief, and biology and are expressed in terms of surface water and
24 ground water storage and flow through the landscape (e.g., uplands, wetlands, lakes, rivers, and
25 floodplains). Therefore, these flowpaths are inherently four-dimensional (i.e., longitudinal, lateral,
26 vertical, and through time).
27

28 The flowpath framework could be briefly presented and discussed in the context of a revised Figure 1-1
29 (currently on page 1-2 of the Report), which could be moved to the beginning of Chapter 3 and
30 expanded to include at least some representation of hydrological, chemical, and biological flowpaths. In
31 the revised figure, each representative type of flowpath could be color coded (e.g., blue for hydrological,
32 red for chemical, and green for biological). The revised Figure 1-1 would thus become Figure 3-1. In the
33 conceptual framework, hydrological flowpaths should be expressed in terms of both surface-water and
34 ground water flowpaths, with the latter including the potential for ground water connections to cross
35 watershed boundaries (McDonnell 2013). Chemical flowpaths should be expressed as largely following
36 hydrological flowpaths, with subtle differences such as the typically tight nutrient spiraling transitioning
37 to increasingly open spiraling from the headwaters to the outlet (Newbold et al. 1981). However,
38 chemical flowpaths could also be expressed as sometimes following biological flowpaths, with
39 examples including marine-derived nutrients being transported to headwater streams by anadromous fish
40 and nutrients being transported between waters and wetlands by birds that eat in one location and
41 defecate in another (Helfield and Naiman 2001). Biological flowpaths should be expressed as aquatic,
42 terrestrial, and aerial flowpaths connecting watersheds internally “ridge to reef” and “reef to ridge” and
43 including the potential for biological connections to cross watershed boundaries (Skagen et al. 2008).
44 Taken to the extreme, the revised Figure 1-1 could become almost infinitely complex and equally
45 incomprehensible, so it is important to clearly state that this is a conceptual framework with
46 representative rather than complete flowpaths.
47

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1 Ground water connectivity, in particular, could be better represented in the Report. The U.S. Geological
2 Survey (USGS) has published numerous reports and learning tools on ground water connectivity,
3 including examples of flowpath frameworks expressed in block diagrams (Heath 1983; 1984; Winter et
4 al. 1998), that contain flows through floodplains. Care should be taken not to imply that bedrock is
5 impermeable, given that ground water flows through bedrock are important flowpaths that connect
6 hydrologic landscapes over long distances and often across watershed boundaries (e.g., Roses et al.
7 1996).

8
9 An important next step is to state how the revised conceptual framework is used in the Report.
10 Connectivity should be discussed as a continuous phenomenon. However, the SAB recognizes that the
11 EPA has chosen to discuss landscape settings discretely in the Report, with separate sections for “rivers
12 and streams,” “waters and wetlands in riparian/floodplain settings,” and “waters and wetlands in non-
13 riparian/non-floodplain settings.” This approach is workable, as long as the discrete classification is
14 mapped onto the continuous conceptual framework. The integration of the discrete classification and
15 continuous framework could be achieved by adding two panels to the revised Figure 1-1 described
16 above, using the same base block diagram. In the second block diagram, all flowpaths could be removed
17 and the classification system showing the three landscape settings (i.e., rivers and streams, waters and
18 wetlands in floodplain settings, and waters and wetlands in non-floodplain settings) could be added.
19 Then, in the third block diagram, the first and second block diagrams could be merged, clearly showing
20 that the continuous phenomena (i.e., the hydrological, chemical, and biological flowpaths) interact
21 across the discrete landscape settings (i.e., connect rivers and streams, waters and wetlands in floodplain
22 settings, and waters and wetlands in non-floodplain settings to one another at the landscape scale).

23
24 Suggested editorial or technical corrections have been identified in the line-by-line preliminary written
25 comments provided by SAB Panel members. Hillslope hydrology is discussed independently here
26 because it is so central to the flowpath framework connecting all parts of the watershed, with water
27 flowing from the “ridge to the reef” and potentially passing through or otherwise interacting with waters
28 and wetlands along the way. The EPA Report should clearly describe the following four pathways
29 through which water flows across the landscape:

- 30
- 31 1) Infiltration-Excess Overland Flow: This is the overland flow that occurs when the rainfall rate
32 exceeds the infiltration rate, resulting in excess rainfall running overland despite a below-surface
33 water table. This flow is also known as Hortonian overland flow because it was first described in the
34 literature by Horton (1945).
 - 35
 - 36 2) Saturation-Excess Overland Flow: This is the overland flow that occurs when the water table rises to
37 the surface, so that all additional rainfall runs overland. This is also known as Dunne’s mechanism
38 because it was first described by Dunne and Black (1970).
 - 39
 - 40 3) Interflow: This is rapid lateral flow in the unsaturated zone of soil and rock. Interflow commonly
41 occurs because above a low-permeability layer there are interconnected macropores that intercept
42 and channel rainfall as would a subsurface pipe (e.g., Beven and Germann 1982).
 - 43
 - 44 4) Saturated Ground water Flow: This is the normal saturated ground water flow, where infiltrating
45 rainfall reaches the water table and then flows laterally along with the general flow in the aquifer.
- 46

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1 The Report should further explain how areas contributing runoff expand and contract, changing the way
2 that landscapes connect through storms and seasons (Dunne and Black 1970). The expansion of runoff
3 producing areas in non-floodplain settings can intermittently or ephemerally change the extent of
4 headwater streams (e.g., Dunne 1978; Rains et al. 2006; 2008; Vanderkwaak and Loague 2001). This
5 type of variability suggests that connectivity should be discussed within a continuum of runoff
6 producing mechanisms. As previously noted, the EPA has chosen to discuss landscape settings
7 discretely, focusing on rivers and streams, waters and wetlands in floodplain settings, and waters and
8 wetlands in non-floodplain settings; however, the lines delineating these landscape categories are
9 conceptual and there is no scientific consensus on separating the categories.

10
11 The Report tends to focus on the site and subregional scales, perhaps due to cost, and access to data and
12 model results. This tends to either ignore or at least downplay the potential significance of regional-scale
13 hydrologic connectivity, especially as it relates to ground water. This is a problem because regional
14 ground water flows commonly interact with the surface environment at sinks and springs. For example,
15 the Floridan aquifer underlies all of Florida as well as portions of Mississippi, Alabama, Georgia, and
16 South Carolina and commonly interacts with the surface environment through sinks, springs, and
17 outcrops (see Sun et al. 1997 and references therein). To provide a better understanding of ground water
18 connectivity, and the way that ground water connectivity might vary spatially, the SAB recommends
19 that the EPA also consider using the ASTM D5979-96 Standard Guide for Conceptualization and
20 Characterization of Ground water Systems (ASTM 1996; Kolm et al. 1996). To better characterize
21 regional-scale ground water connectivity, the SAB recommends that the EPA also consider using
22 findings from the U.S. Geological Survey Regional Aquifer Systems Analysis (RASA) Program. An
23 understanding of regional ground water flow systems is critical to the understanding of four-dimensional
24 hydrologic connectivity on both the local and regional scales. Understanding ground water flow in
25 unique hydrogeologic settings, including the Floridan aquifer system (karst systems), the High Plains
26 aquifer system (semi-arid systems), and the Snake River Plain aquifer system (volcanic bedrock
27 systems), is especially important. These and other unique hydrogeological settings are covered by the
28 RASA Program (Sun et al. 1997).

29
30 The SAB also recommends that the EPA include in the Report additional evidence of biological
31 connectivity. Organismal movement is important for ecosystem function as well as for population
32 dynamics. Organisms use habitats that are critical to their life-history requirements (i.e., their life cycles
33 cannot be completed without these habitats). These habitats are often dispersed throughout watersheds
34 and organisms move in all directions among these habitats throughout their life cycles (e.g., Schlosser
35 and Angermeier 1995; Falke and Fausch 2010). Some species maintain populations in downgradient
36 waters but move upstream or laterally to use habitats that are dry seasonally and in some cases are dry
37 several years in a row (Falke et al. 2010). Thus, these sometimes-dry habitats can be critical to the
38 biological integrity of downgradient waters. Species using these habitats range across many different
39 taxa, even within fish. There are also significant connections from terrestrial to aquatic ecosystems,
40 particularly among macroinvertebrates. The examples used in the Report tend to focus on only a few
41 taxa, primarily salmon and other anadromous fish species. Many fish restricted to freshwater and many
42 other taxa including invertebrates, amphibians, reptiles, birds, and mammals require these critical
43 habitats and move to access them. When these upstream, lateral, and disconnected habitats are degraded
44 or destroyed, populations decline and species can become threatened or endangered (or otherwise
45 imperiled), or are extirpated entirely (Fausch and Bestgen 1997). Therefore, connectivity is a key to the
46 biological integrity of downgradient waters. Moreover, ignoring these connections can result in the
47 listing of new threatened and endangered species, not only for highly imperiled vertebrate groups like

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1 amphibians, but also invertebrates like mussels that are transported by fish (as glochidia, their larval
2 stage) throughout watersheds.

3
4 *Recommendations*

- 5
- 6 • The conceptual framework in the Report should be fully described at the beginning of Chapter 3.
7 The framework should have a flowpath focus showing that watersheds are connected from “ridge to
8 reef,” and that waters and wetlands in the landscape are therefore connected to downgradient waters
9 by hydrological (surface and subsurface), chemical, and biological flowpaths.
 - 10
 - 11 • The conceptual framework in the Report should generally express the importance of climate,
12 geology (surface and subsurface), relief, and biology on flow and transport (e.g., hydrological,
13 chemical, and biological connectivity). The resulting three-dimensional structure should show
14 potential surface, near surface, and subsurface pathways, which then can be analyzed in terms of
15 hydrological, chemical, and biological connectivity in four dimensions (i.e., with the temporal
16 dimension included).
 - 17
 - 18 • The discrete-landscape classification system should be mapped onto the revised conceptual
19 framework in the Report, with explicit acknowledgment that the classification system serves only as
20 a communication tool.
 - 21
 - 22 • Ground water connectivity, including regional ground water connectivity across watershed divides,
23 should be better defined in the Report and described in the context of connectivity between waters
24 and wetlands and downgradient waters.
 - 25
 - 26 • Biological connectivity should be better defined in the Report, described in the context of
27 connectivity between waters and wetlands and downstream waters and shown to be critical to the
28 biological integrity of these connected waters.
 - 29

30 **3.2.6. Layers of Complexity in the Conceptual Framework**

31
32 Once the EPA has described the flowpath framework and explained how the framework is used in the
33 Report, additional layers of complexity (focusing on the issues discussed below) should be represented
34 in the conceptual model. The SAB recognizes that some of these issues are already addressed in various
35 parts of the Report. In those cases, the SAB recommends expanding upon or moving the discussion to
36 the section of the Report that outlines the major concepts underlying the conceptual framework.

37
38 *Functions*

39
40 The SAB recommends layering water and wetland function on the flowpath framework. The Report
41 should indicate that each water and wetland performs functions broadly categorized as source, sink, lag,
42 transformation, and refuge, and that the degree to which each function is performed is dependent upon
43 landscape position and related connectivity. The importance of including this in the discussion of the
44 conceptual framework is to explain up front that some hydrological, chemical, and biological functions
45 are enhanced by connectivity while others are enhanced by relative isolation. This is an important point,
46 one that is implicitly made throughout the Report and explicitly made in the section on “unidirectional”

wetlands. Including a functions layer in the conceptual framework will help clarify the later discussion of functions that are enhanced by connectivity or relative isolation.

Spatial and Temporal Scales

Spatial and temporal scales are critical aspects of connectivity and the role it plays in the chemical, physical, and biological integrity of downgradient waters. However, spatial and temporal scales vary by flowpath type and flowpath characteristics (Figure 1). An illustration similar to Figure 1, focused on the spatial and temporal scale of connectivity, should be included in the Report, with a particular focus on the differences in the spatial and temporal scales of surface-water and ground water connectivity as it relates to the chemical, physical, and biological integrity of downgradient waters.

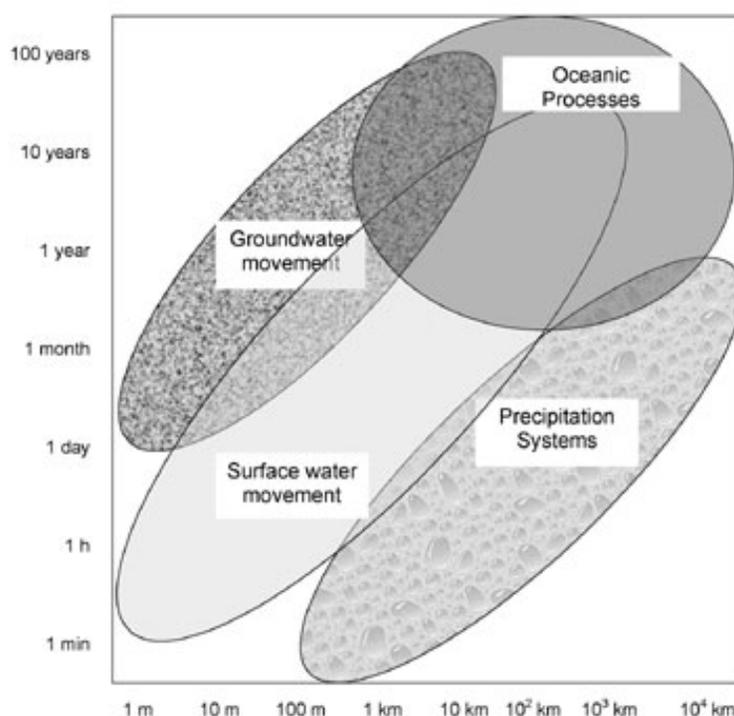


Figure 1: Relative spatial and temporal scale of hydrologic connectivity and interaction. (Source: U.S. Global Change Research Program 2001)

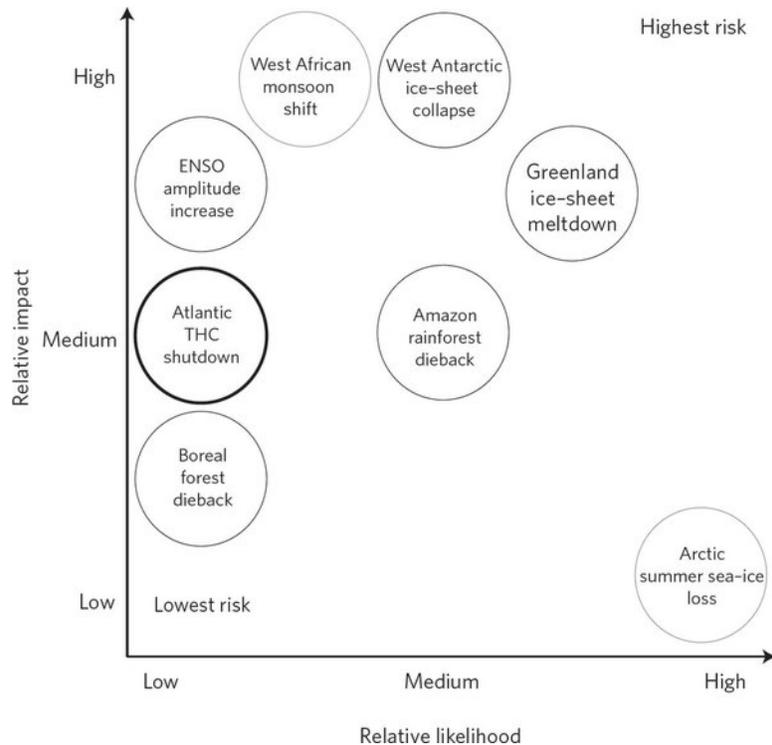
The Report should clearly state that low-frequency events affecting the chemical, physical, and biological integrity of downgradient waters can be particularly important if the effects are essential, long-lived, and/or cumulative. Low-frequency, high-magnitude flows connect channels to the furthest reaches of the floodplains (Poff et al. 1997), thereby controlling species composition and abundance in forests (Darst and Light 2008) and aquatic habitats in the floodplain (Light et al. 1998) and transporting large clasts and/or woody debris that otherwise cannot be transported by more-frequent, lower-magnitude flows (Wolman and Miller 1957). Long-lived effects are exemplified by debris flows, which are low-frequency events that nevertheless can be important mechanisms that connect headwaters to rivers, serving as important sources of sediment to downgradient waters (Benda et al. 2005). Though such debris flows occur infrequently, the consequences can be long lived, and can play important roles in controlling the structure and function of downgradient waters over the scale of decades (Leibowitz et al 2008). Important cumulative effects are exemplified by ephemeral flows in arid landscapes, low-

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1 frequency events that may nevertheless provide most of the subsidies to downgradient waters (Izbicki
2 2007).

3
4 The SAB recommends that the Report compare and contrast the temporal scale of connectivity in the
5 East and the Southwest. In the East, precipitation is weakly seasonal and the weighted-average flux of
6 materials, energy, and/or water-borne organisms is therefore likely greatest in response to moderate-
7 frequency rainfall events; in the Southwest, precipitation is strongly seasonal and the weighted-average
8 flux of materials, energy, and/or water-borne organisms is therefore likely greatest in response to low-
9 frequency rainfall events. The latter are no less important to the integrity of the downgradient waters,
10 even though their frequency and duration may be negligible. Therefore, the importance of the
11 connectivity is not just a function of the frequency or duration of the connection but, rather, the relative
12 magnitude of the connection. One way to conceptualize this in the Report is by developing a matrix of
13 relative likelihood \times relative consequence, which would facilitate a discussion of spaces occupied by
14 given waters and wetlands (Figure 2). Such a figure would go a long way toward helping readers
15 understand the regional context of the spatial and temporal scale of connectivity.
16



17
18
19 **Figure 2: Relative likelihood \times relative impact of global-scale phenomena. (Source: Lenton 2011.**
20 **Reprinted by permission from Macmillan Publishers Ltd: [Nature Climate Change 1\(4\):201-209](#),**
21 **copyright 2011.)**
22

23 *Human-Altered Systems*

24
25 There are few, if any, ecosystems unaltered by humans. The role that these alterations play in the
26 conceptual framework should be addressed explicitly in the Report. Waters and wetlands are
27 "connected" in the sense that they are integrated into the broader hydrological landscape and therefore
28 can play important roles in maintaining the chemical, physical, and biological integrity of downgradient

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1 waters. They perform a variety of functions (which are broadly classified in the Report as source, sink,
2 lag, transformation, and refuge functions) at rates that are a characteristic of where these waters and
3 wetlands are located on the gradient of connectivity. Therefore, downgradient waters might suffer
4 consequences if the degree of connectivity is altered by human activities. Alterations can be of three
5 types - some can directly decrease connectivity, such as dams (Ward and Stanford 1983) and ground
6 water pumping that lowers local water tables and causes surface-water connections to cease (Haag and
7 Pfeiffer 2012); some can directly increase connectivity, such as ditches (Min et al. 2010) and tile drains
8 (Randall et al. 1997); and some can indirectly change the frequency, magnitude, timing, duration, and/or
9 rate of change of connectivity, such as impervious surfaces in the contributing watershed (Walsh et al.
10 2012). Each of these three types of alterations constitute alterations to connectivity and therefore to the
11 chemical, physical, and biological integrity of the downgradient waters.

12
13 *Regionalization*

14
15 The SAB finds that the conceptual framework in the Report is not amenable to considering connectivity
16 in a regional context, especially for regions with unique conditions such as the permafrost regions of
17 Alaska. This problem has been identified by a number of public commenters. The EPA therefore should
18 consider expressing forcings of connectivity in terms of Hydrologic-Landscape Regions (HLRs; Wolock
19 et al. 2004), or an equivalent system. This would not represent a large departure from the approach used
20 in the Report because HLRs are fundamentally a function of climate, geology, and relief, which are
21 already recognized as central controls on watershed hydrology. Using HLRs to consider flow and
22 transport functions would ground the discussion to consistent terminology. The terminology in the
23 Report is currently inconsistent, sometimes referring to climate, geology, and relief, sometimes to
24 climate and watershed characteristics, and other times focusing only on climate. Using the HLRs also
25 would ground the discussion in the Report to peer-reviewed literature on this matter. This could then
26 serve as a means to discuss regionalization, because generalizations are context dependent, i.e., the
27 expressions of chemical, physical, and biological phenomena depend on environmental setting (e.g.,
28 climatic, geologic, topographic). Associated with this issue is the fact that much more is known about
29 connectivity in some settings than others. The Report could be improved by explicitly recommending
30 that readers use the HLRs to better understand the relevance of the findings in the document to their
31 respective regions.

32
33 *Aggregate or Cumulative Effects*

34
35 The aggregate or cumulative effect of many waters and wetlands on the chemical, physical, and
36 biological integrity of downstream waters is sufficiently important to merit its own subsection in the
37 Report. Mainstem rivers integrate and accumulate the materials, energy, and organisms that flow by
38 surface-water and/or ground water flowpaths from numerous waters and wetlands. This is an important
39 concept because the individual effect of any single water or wetland on downstream waters might be
40 negligible, but the cumulative effects of many similarly situated waters and wetlands on downstream
41 waters might nevertheless be important. For example, the degradation of a single small, headwater
42 stream might have a negligible effect on the physical, chemical, and biological integrity of downstream
43 waters, but the aggregate or cumulative effect of the degradation of all small, headwater streams would
44 have a large effect on downstream waters (Alexander et al. 2007).

45
46 Cumulative effects could be defined as an emergent property of all headwater streams in the watershed
47 (i.e., a river network statistical attribute). A measurable effect on the integrity of downstream waters

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1 may not be detected if only a small number of headwater streams within a watershed were impacted,
2 whereas there could be substantial and possibly cascading effects on downstream waters were a larger
3 number of headwater streams impacted. Moreover, the extent of downstream effects reflects a
4 convolution—both in space and time—of each headwater stream’s time-varying flux of mass, materials,
5 and organisms. For example, in a watershed with a 200-year recurrence interval of debris flows on
6 headwater streams, the probability of a debris flow on any given headwater stream in a given year is
7 0.5% - likely a negligible effect on fish habitat in downstream waters. However, at the watershed scale,
8 there are hundreds of headwater streams, which means that the annual probability of a debris flow in the
9 “population” of headwater streams is much higher and more likely to substantially affect downstream
10 fish habitats. Studies have been published on these kinds of cumulative effects, such as the aggregate
11 effects of individually occurring debris flows in headwater streams controlling the long term sediment
12 flux and storage in higher order channels (Benda and Dunne 1997a,b) and the cumulative effects of
13 wetlands on watershed hydrology (e.g., Johnston et al. 1990). Therefore, any evaluation of changes to
14 individual waters and wetlands must consider the context of past and future (e.g., as a consequence of
15 climate change) alterations of other waters and wetlands in the watershed. The SAB recommends that
16 the EPA consider reviewing the following additional studies on the cumulative and aggregate effects of
17 streams and wetlands on downstream waters: Ahmed (2014); Bedford and Preston (1988); Benda et al.
18 (2003); Brinson (1988); Dietch et al (2013); Dunne et al (2001); Gabet and Dunne (2003); Johnston
19 (1994); Lancaster and Casebeer (2007); Reid (1998); Squires and Dube (2013); and Schindler (2001).

20
21 *Map Scale*

22
23 The important issue of map resolution is mentioned in several parts of the Report but it needs to be more
24 clearly and thoroughly presented in a separate section, or perhaps in a figure comparing the results of
25 using different technologies. A related topic that could be addressed in the Report is the increasing
26 availability of light detection and ranging (LiDAR) digital elevation models (DEMs) and thus the
27 increasing ability to create more accurate water and wetland maps; this illustrates how new technologies
28 may influence the scientific understanding of connectivity.

29
30 It is critical that readers of the Report understand that many existing databases do not include small
31 streams and thus do not represent the full extent and magnitude of the river and stream network. For
32 example, Meyer and Wallace (2001), estimating stream extent in a North Carolina watershed using maps
33 with different resolution, found 0.8 km of stream channel on a 1:500,000 scale map and 56 km of stream
34 channel on a 1:7200 scale map. The increasing availability of high resolution DEM, including the USGS
35 National Elevation Dataset (NED) 10 m DEM (USGS 2014) and more robust flow routing algorithms
36 means that more accurate stream maps are becoming increasingly available. Thus the ability to predict
37 (and discern) hydrological, chemical, and biological connections between small and large streams is
38 increasing rapidly. Mapping scale also applies to wetlands in non-riparian non-floodplain settings. Frohn
39 et al. (2009; 2012), Lane et al. (2012), and Martin et al. (2012) tried to map geographically isolated
40 wetlands (i.e., wetlands surrounded by uplands) but found that currently available spatial data were
41 inadequate for the task, in large part due to the limitations of the scale and/or accuracy of the maps used
42 to determine whether or not a wetland was surrounded by upland. Hence, the degree of connectivity will
43 be determined in some part by in the database and/or data collection technology used for the analysis.

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1 *Recommendations*

- 2
- 3 • Once the EPA has described the flowpath framework and explained how the framework is used in
4 the Report, additional layers of complexity should be represented in the conceptual model. In
5 developing additional layers of complexity, the EPA should focus on the following issues.
6
 - 7 – A water and wetland function framework should be layered on the flowpath framework. EPA should
8 indicate that each water and wetland performs functions broadly categorized as source, sink, lag,
9 transformation, and refuge, with the degree to which each function is performed being dependent
10 upon landscape position and related connectivity.
 - 11 – Spatial and temporal scales should be addressed in the discussion of connectivity and the role it
12 plays in the chemical, physical, and biological integrity of downstream waters. The Report should
13 discuss the potential importance of low-frequency events.
 - 14 – The role that human alterations play in the conceptual framework should be addressed explicitly.
 - 15 – The EPA should consider expressing forcings of connectivity in terms of Hydrologic-Landscape
16 Regions, or HLRs to help readers to understand the regional relevance of findings in the Report.
 - 17 – The aggregate or cumulative effect of many waters and wetlands on the chemical, physical, and
18 biological integrity of downgradient waters is sufficiently important to merit its own subsection in
19 the Report.
 - 20 – The important issue of map resolution is mentioned in several parts of the report, but it should be
21 more clearly and thoroughly presented in a separate section.
22

23 **3.2.7. Summary and Synthesis of the Conceptual Framework**

24

25 Chapter 3 of the Report ends abruptly, with no summary or synthesis of the conceptual framework. The
26 SAB recommends that the EPA consider moving Figure 6.1 (The role of connectivity in maintaining the
27 physical, chemical, and biological integrity of water) to the end of Chapter 3. The figure could then be
28 used as a means of summarizing and synthesizing the conceptual model and explaining how the model
29 guides the way that the EPA is thinking about and presenting evidence of connectivity between waters
30 and wetlands and downgradient waters. This figure succinctly shows the role played by connectivity in
31 maintaining the chemical, physical, and biological integrity of downgradient waters and hence would
32 serve this purpose well in Chapter 3.
33

34 *Recommendation*

- 35
- 36 • A summary and synthesis of the conceptual framework should be added to the end of Chapter 3 of
37 the Report using what is currently Figure 6.1 to frame the discussion.
38

39 **3.3. Ephemeral, Intermittent, and Perennial Streams: Review of the Literature**

40

41 *Charge Question 3(a). Chapter 4 of the draft Report reviews the literature on the directional*
42 *(downstream) connectivity and effects of ephemeral, intermittent, and perennial streams (including flow-*
43 *through wetlands). Please comment on whether the Report includes the most relevant published*
44 *literature with respect to these types of streams. Please also comment on whether the literature has been*
45 *correctly summarized. Please identify any published peer reviewed studies that should be added to the*
46 *Report, any cited literature that is not relevant to the review objectives of the Report, and any*
47 *corrections that may be needed in the characterization of the literature.*

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1
2 Chapter 4 of the Report is an extensive review of the literature that describes the connectivity of
3 headwater streams to downstream waters. The Report documents the current scientific understanding
4 that there are numerous ways headwater streams are connected to downstream ecosystems and that these
5 connections can be essential in promoting the physical, chemical, and biological integrity of downstream
6 ecosystems. The connections between headwaters and downstream ecosystems are well established as a
7 foundational concept in stream ecology.

8
9 The EPA's review is based on pertinent literature and is strongly grounded in current science. However,
10 the SAB provides a number of recommendations to improve the literature review in Chapter 4 of the
11 Report. The SAB has identified additional references to relevant peer reviewed literature that the EPA
12 should consider citing in the Report.

13
14 **3.3.1. Hydrologic Exchange Flows between Main Channels and Off-Channel Areas**

15
16 The SAB recommends that the literature review in Chapter 4 of the Report be expanded to include the
17 description of exchanges between main channels and off-channel surface and shallow subsurface waters
18 located at channel margins (e.g., pools, recirculating eddies, subsurface hyporheic flow paths) and in
19 upstream or off-channel areas that may become connected during wet periods (e.g., variable source areas
20 or off-channel sloughs or riparian areas). The Report should include a more complete discussion of the
21 soil-water processes involved and give more attention to spatial and temporal variability that could
22 affect connectivity of streams. The revised text should also include broader discussion of associated
23 biogeochemical transformations that change the form and mobility of dissolved chemicals that affect
24 downstream water quality. The discussion should go beyond solely discussing nitrate removal to include
25 phosphorus removal and examples of fate and transport of contaminants such as toxic metals and
26 organic contaminants. A discussion is also needed of the geomorphological control of soil moisture and
27 patch diversity that impacts riparian plant communities (Stromberg 2001). The review should also
28 describe how surface-subsurface water interactions affect stream temperature and habitat for fish and
29 other organisms, particularly when surface water flows diminish but subsurface flow is present.

30
31 *Recommendations*

- 32
33 • The review of hydrologic exchange flows between main channels and off channel areas should be
34 expanded in the Report to include the topics summarized above.
35
36 • The following references (and others that are similar) should be considered for inclusion in a broader
37 discussion of hyporheic processes: Stromberg 2001, Buffington and Tonina (2009); Karwan and
38 Saiers (2012); Poole et al. (2006); Sawyer, et al. (2011); and Stonedahl et al. (2010).

39
40 **3.3.2. Naturally Occurring Chemical Constituents, Contaminants, and Contaminant**
41 **Transformations**

42
43 The EPA should expand the discussion in the Report of naturally occurring chemical constituents other
44 than nutrients (i.e., nitrogen and phosphorus), contaminants, and contaminant transformations. The SAB
45 finds that the Report needs a more thorough characterization of upslope (surface and subsurface) effects
46 of geology, soils, and hydrology on overall water chemistry (e.g., conductivity, alkalinity, pH, major
47 cations) and the consequences of altering these upslope processes on downstream water chemistry and

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1 associated ecological responses. The role of nutrient spiraling as a demonstration of connections
2 between headwaters and downstream ecosystems is covered in the Report, but the Report could be
3 strengthened if more attention were given to the important transformations that affect mobility, toxicity,
4 and time lags of storage or degree of removal that occurs and how it affects downstream loading of
5 nutrients and contaminants. The Report should also further discuss both sediments and sediment-bound
6 contaminants and their downstream movement and effects on downstream waters.

7
8 The following references (and others that are similar) should be considered for inclusion in the
9 discussion of naturally occurring chemical constituents, contaminants and contaminant transformation
10 processes: Baker et al. (2000); Bourg and Bertin (1993); Conant et al. (2004); Doyle et al. (2003);
11 Ensign et al. (2008); Findlay (1995); Fuller and Harvey (2000); Harvey and Fuller (1998); Harvey et al.
12 (2013); Hedin et al. (1998); Kim et al. (1992); Kim et al. (1995); Kimball et al. (1994); Lautz and
13 Fanelli (2008); Malcolm et al. (2005); and O'Connor and Harvey (2008).

14
15 *Recommendations*

- 16
- 17 • The Report should be revised to include discussion of naturally occurring chemical constituents
18 other than nutrients (i.e., nitrogen, phosphorus) such as contaminants and consider nutrient and
19 contaminant transformation processes and the effect of these processes on downstream water quality,
20 if known.
 - 21 • The additional references identified above, and others that are similar, should be considered for
22 inclusion in the discussion.
- 23
24

25 **3.3.3. Factors that Influence Stream Temperature**

26
27 Stream temperature is an important component of ecosystem integrity because it controls many
28 fundamental ecosystem properties and processes. Upslope factors affect the relative contributions of
29 surface and shallow and deeper subsurface waters to channel flow and can affect stream temperature and
30 downstream connectivity. The SAB recommends that discussion of this topic be expanded to (1) discuss
31 the treatment of the direct and indirect effects of upstream/upslope riparian shading, channel
32 morphology, and channel network topology on stream temperature, (2) expand the discussion of how
33 environmental alterations in channels and upslope areas influence connectivity, and thus, stream
34 temperature dynamics, (3) directly address the influence of stream temperature on downstream
35 connectivity and vice versa, and (4) more explicitly describe the effects of hyporheic flow and storage
36 and resulting lag and attenuation effects that buffer temperature extremes within streams. The discussion
37 of these latter subsurface hyporheic effects should include a comparison to direct ground water
38 discharge in terms of their comparative effects on stream temperature dynamics (Callahan et al. in
39 press).

40
41 *Recommendations*

- 42
- 43 • The discussion of upslope factors that influence stream temperature should be expanded to include:
44 hyporheic flow and storage, a comparison to ground water effects on stream temperature;
45 upstream/upslope riparian shading; channel morphology; channel network topology; and
46 environmental/human alterations in upslope areas and channels.
- 47

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- 1 • The Report should explicitly discuss the influence of stream temperature on downstream
2 connectivity and vice versa.
- 3
- 4 • The following references (and others that are similar) should be considered for inclusion in the
5 discussion of factors that influence stream temperature: Arrigoni et al. (2008); Hester et al. (2009);
6 and Sawyer et al. (2012).
- 7

8 **3.3.4. Clarifying the Temporal Dynamics of Flow-Related Aspects of Connectivity**

9

10 The Report lacks a succinct yet comprehensive paragraph that covers the temporal dynamics of
11 connectivity for headwater streams (e.g., headwaters that connect perennial, intermittent, and ephemeral
12 channels with their variable source areas) and effects on the transport of materials and sediment and on
13 the physical, chemical, and biological integrity of downstream waters. Connections that are highly
14 variable in time can also be important to biota, and influence the biological integrity of downstream
15 waters, such as when fish or amphibians breed in habitats that are dry most of the year or for several
16 years. The timescale of these temporally variable connections (i.e. connected at certain times) could
17 range from seasons, years, or decades to centuries. In addition, some aspects of connectivity occur over
18 relatively short times frames and are highly stochastic but can represent important connections to
19 downstream ecosystems. For example, major erosion or woody debris fluxes that occur infrequently
20 during high runoff events may represent major sources of sediments or large wood to downstream
21 ecosystems.

22

23 Chapter 4 of the Report would benefit from a separate section on the temporal dynamics of connectivity.
24 The SAB recommends that the report characterize the temporal dynamics of streamflow (i.e.,
25 magnitude, frequency, duration, and timing) that explicitly connect these ecosystems to downstream
26 waters. For example, the report correctly describes how headwater streams can contribute a large
27 fraction of the water in downstream ecosystems over an annual cycle, even though they are periodically
28 dry. However, the report should explore the *effect* of short duration connections on downstream
29 ecosystems. More discussion and additional literature citations should be included to describe how even
30 short duration and highly episodic flow connections and longer duration periods of dry conditions can be
31 important to downstream ecosystems. The SAB also recommends that the Report be revised to explicitly
32 recognize the important role of variable hydraulic residence times in river networks and their effects on
33 the storage and transformation of organic matter and nutrients in downstream waters. In addition, the
34 Report should discuss how human alterations affect the natural temporal dimensions of connectivity
35 (e.g., water withdrawal or augmentation can alter the timing and duration of flow). Overall, the SAB
36 recommends that report include a clear discussion how intermittent and ephemeral streams are
37 connected in space and time to downstream ecosystems and the consequences of these connections for
38 physical, chemical, and biological integrity.

39

40 The following references (and others that are similar) should be considered for inclusion in the Report to
41 illustrate the ways in which intermittent and ephemeral streams are connected in space and time to
42 downstream ecosystems and the effects of time-varying flow connections: McDonough et al., 2011;
43 Levick et al., 2008; Boano et al. (2013); Brooks et al. (2006); Constantz (2008); Harvey et al. (2012);
44 and O'Connor et al. (2012); RWRD (2002); and Walker et al. (2005).

45
46
47

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1 *Recommendations*

- 2
- 3 • The Report should include a new section that explicitly examines the temporal dynamics of
4 connectivity for headwater streams (e.g., headwaters that connect perennial, intermittent, and
5 ephemeral channels with their variable source areas) and effects on the transport of materials and
6 sediment, and the physical, chemical, and biological integrity of downgradient waters. The new
7 section should note that it is the *effect* of flows that determines their importance to downstream
8 connectivity.
 - 9
 - 10 • The Report should be revised to explicitly recognize the important role of variable hydraulic
11 residence time in river networks and its effects on the storage and transformation of organic matter
12 and nutrients in downstream waters.
 - 13
 - 14 • The Report should include discussion of how human alterations affect the temporal dimensions of
15 connectivity, e.g. via water withdrawal or augmentation and effluent-dependent or dominated stream
16 flow.
 - 17
 - 18 • The additional references identified above (and others that are similar) should be considered for
19 inclusion in the Report.
 - 20

21 **3.3.5. Strengthening the Review of Biological Connectivity**

22
23 As previously mentioned, the report should be revised to more thoroughly document evidence that biota
24 move throughout aquatic and riparian systems (e.g., in upstream, lateral, and downstream waters) to use
25 critical habitats and that these movements have strong and important effects on biological integrity. A
26 more thorough treatment of biological connectivity would strengthen Chapter 4 of the report. The
27 following key points should be included in the Chapter:

- 28
- 29 – Organisms require habitats that are dispersed throughout watersheds (i.e., their populations cannot
30 persist without these habitats), and many species move among these habitats during their life cycles
31 (e.g., Fausch et al. 2002; Kanno et al. 2014).
- 32
- 33 – Some species maintain populations in downstream receiving waters, but move upstream or laterally
34 to use habitats that are dry seasonally and in some cases are dry several years in a row. Thus, these
35 intermittent or ephemeral habitats often can be critical to the biological integrity of downstream
36 waters (Falke et al. 2010).
- 37
- 38 – Mobile species that use ephemeral or intermittent waters include many different taxa, even within
39 fish, and encompass many more than those identified in the Report, which focuses largely on salmon
40 and other anadromous fish. Many fish living solely in freshwater, and many other taxa including
41 amphibians, reptiles, birds, mammals, and important invertebrates, require these habitats and move
42 to access them.
- 43
- 44 – Data from comparative studies and experiments show that some animal populations decline or are
45 extirpated entirely when upstream, lateral, and disconnected habitats are degraded or destroyed, or
46 the connections are lost (e.g., owing to constructed barriers; e.g., Fausch and Bestgen 1997). Thus,

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1 connectivity to these habitats is a key to the biological integrity of downstream waters. Dam and
2 dam-removal literature may be helpful to illustrate this point.

- 3
4 – A failure to recognize the importance of biological and habitat connections can result in the listing of
5 new threatened and endangered species, especially for highly imperiled vertebrate groups like
6 amphibians, but also highly imperiled groups of invertebrates like mussels whose larvae are
7 transported throughout watersheds by their fish hosts (Vaughn 2012; Schwalb et al. 2013).

8
9 *Recommendation*

- 10
11 • The Report should more thoroughly document evidence that biota move throughout the lotic system
12 (e.g., in upstream, lateral, and downstream waters) in order to use critical habitats and that these
13 movements have strong and important effects on biological integrity of downstream waters, as
14 detailed in the points above.

15
16 **3.3.6. Review of the Human-Modified Headwater Stream Literature**

17
18 As previously mentioned, the SAB finds that the Report lacks references to the literature on human-
19 modified headwater streams. This literature (e.g., Blann et al. 2009) should be included in the Report in
20 order to provide information about the consequences of alterations of headwater systems to the physical,
21 chemical, and biological integrity of downgradient waters. Many headwater stream ecosystems are
22 altered by land use change and human activity that often disrupts connectivity; the current version of the
23 report generally excluded the many studies that have been conducted in human-modified stream
24 ecosystems. The SAB finds that there are many insights to be gained about the importance of
25 connectivity to downstream waters, either when connections are severed or enhanced. Including
26 additional information from this large area of research will provide more examples of the importance of
27 connectivity, and the SAB recommends that information about human-modified systems should be
28 included in the report.

29
30 The SAB recommends that writers of the report consider including examples from at least *some* of the
31 following human alterations: agricultural ditches and tile drains, urban lined channels and buried
32 streams, removal of riparian trees, cattle grazing, gravel mining, channel diversions, low-head dams,
33 grade control structures, stream restoration, accelerated erosion, sediment transport and storage, stream
34 restoration, and effluent dominated streams. The following references (and others that are similar) could
35 be considered for inclusion in the Report to illustrate the effects of human alterations to headwater
36 streams: Booth (1990); Bull and Scott (1974); Chin and Gregory (2001); Doyle et al. (2000); Graf
37 (2006); Gregory (2006); Faulkner (2004); Horner et al (2001); Lautz et al. (2008); and O'Connor et al.
38 (2010); Paul and Meyer (2001); Schumm et al (1984); Williams and Wolman (1984); and Wohl (2005).

39
40 *Recommendations*

- 41
42 • The draft Report should be revised to include information about the consequences of human
43 alteration of headwater systems on their connectivity and concomitant effects on the water quantity
44 and quality and biota of downstream ecosystems. These revisions could, for example, include
45 discussion of some of these topics listed above.

- 1 • The additional references identified above, and others that are similar, should be considered for
2 inclusion in the Report.
3

4 **3.3.7. The Role of Headwater Streams in Aggregate and Cumulative Effects on Downstream** 5 **Ecosystems** 6

7 The SAB recommends that a new section on the role of headwater streams in aggregate and cumulative
8 effects on downstream ecosystems be added to Chapter 4 of the Report. This new section should draw
9 upon the large body of literature on cumulative watershed effects of land use, based on both modeling
10 and empirical approaches. In addition, the existing section on watershed modeling should be improved
11 by expanding the discussion to include results from models beyond the just the SPARROW model
12 (SPAtially Referenced Regressions On Watershed attributes) and encompass the numerous modeling
13 and empirical approaches that have been used. In addition, the report could draw upon examples from
14 literature that investigates the movement of sediments through watershed for examining aggregate and
15 cumulative effects on downstream waters.
16

17 *Recommendations* 18

- 19 • A new section on aggregate and cumulative effects of headwater streams on downstream ecosystems
20 should be added to Chapter 4 of the Report.
21
- 22 • The findings of the modeling and empirical studies on the cumulative effects of land use on the
23 physical, chemical, and biological integrity of downgradient waters should be summarized in the
24 Report.
25
- 26 • The modeling section of the Report should be expanded to include results from other models in
27 addition to the SPARROW model (SPAtially Referenced Regressions On Watershed attributes).
28
- 29 • The following references (and others that are similar) should be considered for inclusion in the
30 Report to document the role of headwater streams in aggregate and cumulative effects on
31 downstream ecosystems: Alexander et al. (2009); Böhlke et al. (2009); and Helton et al. (2011).
32

33 **3.3.8 Connections to the Broader Riverine Landscape** 34

35 The report focuses primarily on the connections among components of the aquatic system, including not
36 only hydrologic connections but also those made by organisms that walk, crawl, or fly between water
37 bodies. However, the physical, chemical, and biological integrity of downstream waters also depends on
38 the presence of intact headwaters, and the integrity of these headwater ecosystems depends on critical
39 connections between streams and the broader riverine landscape. Given this, the SAB finds that more
40 emphasis could be placed on the importance of these connections to the integrity of downstream waters.
41

42 For example, the beneficial ecological effects of streamside vegetation are not exclusively associated
43 with riparian wetland function, but include effects of inputs of leaf litter and terrestrial insects on
44 downstream food resources, effects of woody debris on channel morphology, sediment and organic
45 matter storage, hydrologic retention, and modulation of stream temperature. These beneficial effects
46 occur along the entire longitudinal stream profile, but are especially important to headwater streams. The

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1 SAB recommends that the draft Report be revised to expand the discussion of the effects of streamside
2 vegetation on stream ecosystems.

3
4 The SAB also recommends adding information to address the importance of food-web connections from
5 riparian zones to streams that support aquatic organisms. Organisms that define the biological integrity
6 of downstream waters are embedded in food webs and these food webs transcend aquatic-terrestrial
7 boundaries. Following are key points that should be included:

- 8
9 1) Streams receive organic matter in the form of leaves, wood, and other plant litter from riparian
10 vegetation, and these supply essential carbon and nutrients to biota ranging from microbes to
11 invertebrates, which in turn feed larger invertebrates, fish, amphibians, reptiles, birds, and
12 mammals (e.g., Wallace et al. 1997; Baxter et al. 2005).
13
14 2) Streams also receive terrestrial invertebrates, which are used directly as prey by fish and
15 amphibians, either in the same reach, or after flowing downstream from headwaters into reaches
16 that support these predators (e.g., Nakano and Murakami 2001; Wipfli and Baxter 2010).
17
18 3) These linkages between riparian zones and streams are critical to maintaining the biological
19 integrity of the Nation's waters. Data from comparative studies and experiments support the
20 generalization that cutting off these connections can cause emigration or extirpation of organisms
21 that rely on food web connections between streams and riparian zones (Fausch et al. 2010).
22

23 Overall, these food webs integrate key connections across aquatic and terrestrial landscapes and
24 therefore provide a useful framework through which to view the role of riverine landscapes in
25 connectivity among aquatic ecosystems.

26
27 *Recommendations*

- 28
29 • The Report should be revised and additional references should be added to expand the discussion of
30 the effects of streamside vegetation on stream ecosystems.
31
32 • The SAB recommends adding information to the Report to document the importance of reciprocal
33 food-web connections between riparian zones and streams on the integrity of the ecosystems that are
34 connected to downstream waters
35

36 **3.3.9. Clarifying How Case Studies Were Selected**

37
38 As previously discussed, the SAB recommends that text be added to the Report to clarify how the case
39 studies were selected. In addition, a case study that focuses on human-dominated systems should be
40 added to the Report in order to include information about the effect of human-dominated systems on
41 downstream waters. For example, the Rio Grande case study on arid rivers provides excellent examples
42 of human-modified systems and its description of human effects could be expanded. Other examples
43 include the Baltimore and Central Arizona Long Term Ecological Research Projects (Cary Institute of
44 Ecosystem Studies 2014; Long Term Ecological Research Network 2014). The SAB notes that the San
45 Pedro River example in the Report is never mentioned or interpreted in other parts of the Report.
46
47

1 *Recommendations*

- 2
- 3 • The Report text should explain the rationale for selecting case studies.
 - 4
 - 5 • The Report could contain a case study that illustrates the downstream effects of human-modified
 - 6 systems. The Baltimore and Central Arizona Long Term Ecological Research Projects are good
 - 7 examples.
 - 8

9 **3.3.10. Clarifying the Report Findings Concerning the Strength or Degree of Downstream**
10 **Connectivity**

11

12 The SAB recommends that the Report text be revised to address the strength or degree of downstream
13 connectivity. In particular, the SAB finds that the Report needs a more focused discussion of the relative
14 strength/degree of connectivity of intermittent and ephemeral streams, including streams with
15 evaporative losses, and their variable source areas. This could be achieved through a discussion of the
16 frequency, duration, and magnitude of surface and subsurface connections. It is important to note that
17 subsurface flows often persist after surface flows wane; further, these subsurface flows may provide
18 important connectivity functions from ephemeral and intermittent streams to downstream waters. In
19 addition, as previously mentioned, even ephemeral and intermittent streams and short duration surface
20 water connections in source water areas may have substantial effects on the chemical and biological
21 integrity of downstream waters.

22

23 *Recommendations*

- 24
- 25 • The SAB recommends that the degree/strength of downstream connections be highlighted or
 - 26 discussed in each major subsection of Chapter 4 (e.g. for subsections on temperature, chemical, and
 - 27 biological connections). In particular, the SAB recommends that the Report contain a more focused
 - 28 discussion of the relative strength/degree of connectivity of intermittent and ephemeral streams to
 - 29 downstream waters.
 - 30
 - 31 • The SAB recommends that the following references (and others that are similar) be considered for
 - 32 inclusion in the Report to document the strength or degree of downstream connectivity: Goodrich et
 - 33 al. (2004); Graf (1988); Hernandez et al. (2000); Larsen et al. (2012); Osterkamp et al. (1994); and
 - 34 Stratton et al. (2009).
 - 35

36 **3.4. Ephemeral, Intermittent, and Perennial Streams: Review of the Findings and Conclusions**

37

38 *Charge Question 3(b). Conclusion (1) in section 1.4.1 of the draft Report Executive*
39 *Summary discusses major findings and conclusions from the literature referenced in*
40 *Charge Question 3 (a) above. Please comment on whether the conclusions and findings*
41 *in section 1.4.1 are supported by the available science. Please note alternative wordings*
42 *for any conclusions and findings that are not fully supported.*
43

44 Conclusion 1 in Section 1.4.1 of the Report states that: *The scientific literature demonstrates that*
45 *streams, individually or cumulatively, exert a strong influence on the character and functioning of*
46 *downstream waters. The Report further states that: All tributary streams, including perennial,*
47 *intermittent, and ephemeral streams, are physically, chemically, and biologically connected to*

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1 *downstream rivers via channels and associated alluvial deposits where water and other materials are*
2 *concentrated, mixed, transformed, and transported.* The SAB finds that the Report provides strong
3 scientific support for these conclusions and findings. However, EPA should recognize that there is a
4 gradient of connectivity that is a function of the frequency, magnitude, and duration of physical,
5 chemical, and biological processes. The SAB strongly supports the current emphasis in this Section on
6 the importance of considering cumulative impacts and recommends minor but nevertheless important
7 changes in the conclusions and findings in Section 1.4.1.

8
9 The Report should be revised so that the conclusions and findings in Section 1.4.1 are clearly linked to
10 the foundational concept that connectivity is expressed in four dimensions (i.e., three dimensional space,
11 plus time) within the context of a catchment. The SAB recommends that the conclusions emphasize not
12 only hydrologic linkages, but also include biogeochemical transformations and diverse biological
13 connections. The text in Section 4.6 of the Report, “Synthesis and Implications,” (p. 4-35) could be
14 improved through the use of bullets that would highlight the main findings. This would underscore the
15 key functions summarized in Table 4.1 which outline the five key stream functions and their effect on
16 downstream waters: sources, sinks, refuges, transformations, and lags. The SAB recommends adding
17 connectivity itself to Table 4.1, perhaps using both hydrological and biological connections as examples.
18 In addition, the Report’s five key functions and linkages (six if connectivity is included) should be
19 reiterated succinctly³ and consistently across the relevant Report chapters. These are Sections 4.6,
20 “Streams: Synthesis and Implications” (p. 4-35); Section 1.4.1, “Key Findings” (p.1-7); and Section 6.1,
21 “Major Conclusions” (p. 6-1). At present, these summaries vary in content, length, writing and
22 presentation style, and number of literature citations and, most importantly, these inconsistencies
23 obscure the Report’s conclusions.

24
25 *Recommendations*

- 26
27 • The conclusions in Section 1.4.1 of the Report should be clearly linked to the foundational concept
28 that connectivity is expressed in four dimensions (i.e., three dimensional space plus time) within the
29 context of a catchment.
- 30
31 • The conclusions in Section 1.4.1 should emphasize not only hydrologic linkages, but also include
32 biogeochemical transformations and diverse biological connections.
- 33
34 • Bullet points should be used to highlight main findings in the text on “Synthesis and Implications.”
- 35
36 • Different types of connectivity (e.g., hydrologic, biological) should be added to Table 4.1 of the
37 EPA report. In addition, the EPA Report should explain that not all connectivity in the watershed is
38 hydrologic, and that biological connectivity should be mentioned as an example.
- 39
40 • The Report’s key functions and linkages should be succinctly and consistently summarized across
41 all the relevant Report chapters.

42
43

³ The summary should not include reference to literature already cited in the Report.

1 **3.4.1. Recommendations to Strengthen the Findings and Conclusions Concerning Ephemeral,**
2 **Intermittent, and Perennial Streams**
3

4 The SAB recommends that the Report be revised to strengthen the findings and conclusions concerning
5 ephemeral, intermittent, and perennial streams by addressing the specific issues discussed below.
6

7 *Connectivity, Boundaries and Linkages*
8

9 The SAB recommends that the statements in the Report that support conclusions about the connectivity
10 of streams should be stated in quantitative terms wherever possible (For example: “of X studies, X%
11 support the conclusion of connectivity.”)
12

13 The SAB also recommends that the text of the Report be revised to provide better definition of
14 boundaries (e.g., transitions between uplands and headwaters) and acknowledge where boundaries are
15 difficult to define. The report should also better define and emphasize key linkages and exchanges that
16 influence connectivity (e.g., ground water-surface water interactions, flooding or other episodic events,
17 and the influence of riparian zones) and how these linkages influence biota and food webs and vice
18 versa. For example, the first sentence in Section 4.6, “Streams: Synthesis and Implications,” should be
19 revised to state “A substantial body of evidence unequivocally demonstrates connectivity *above and*
20 *below ground.*” The conclusions should also reiterate how these linkages and exchanges influence
21 physical, chemical, and biological connectivity with downstream systems.
22

23 The SAB finds that neither connectivity linkages that occur during flooding, nor the lack thereof during
24 droughts, are well-recognized in the conclusions. Although drought is a natural disturbance, its effects
25 can be exacerbated by human activities (i.e., water extraction; wetland drainage) with impacts on
26 connectivity. In addition, the SAB recommends that text be added to the Report to explain hydrologic
27 connectivity where surface water sustains aquifers in some environments, and aquifers sustain streams in
28 other environments. Alluvial systems in the southwest and karst systems in the eastern U.S. could be
29 used as examples. In addition, the perennial streams in the Colorado Plateau and the Rocky Mountain
30 and High Plains systems could be used as specific examples of aquifers sustaining streams. Floodplains
31 locally and regionally may function in one or both directions; particularly with spring runoff/flooding
32 (ground water recharge and water table rise) versus fall baseflow (ground water discharge and water
33 table lowering).
34

35 *Ephemeral Streams*
36

37 The Report concludes that existing evidence supports a sufficient link between ephemeral streams and
38 downstream systems. This conclusion could be strengthened in three ways: (1) by adding text that
39 describes spatial and temporal variation in linkages of ephemeral streams with downstream waters; (2)
40 by summarizing existing evidence of the frequency and duration of these connections; and (3) by
41 identifying where further research is needed. For example, the Report currently emphasizes the
42 important role of variable source areas (e.g., swales) in downstream connectivity; this role should be
43 reiterated in the conclusions. In addition, the conclusions in the Report should emphasize that dynamic
44 ground water-surface water connections not only maintain the ecological integrity of ephemeral streams,
45 but also connect them structurally and functionally to downstream waters, whether or not the upstream
46 channels are perennial. Finally, the SAB recommends that the conclusions concerning ephemeral

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1 streams be strengthened by clarifying how and when ephemeral headwaters provide critical habitat and
2 corridors for biota commonly connected to habitats associated with downstream rivers.

3
4 *Chemical Connectivity and Nutrients*

5
6 The SAB finds that the summary of chemical functions that has been included in the Report could be
7 strengthened by adding details about how headwater streams influence sediment-bound nutrients,
8 dissolved organic matter (DOM), and contaminants; the text now focuses primarily on nitrogen, with
9 detailed examples provided only for nitrate as it related to denitrification.

10
11 The SAB also finds that the Chapter 4 of the Report is currently too focused on headwaters as hotspots
12 for uptake and transformation of nitrogen; more breadth across solutes should be added. The text should
13 also be revised to include nutrient removal processes in the discussion on the importance of nutrient
14 spiraling because both assimilatory and dissimilatory processes are important. Currently, the text focuses
15 on the role of denitrification processes in removing nitrate-N from streams.

16
17 *Treatment of Uncertainty*

18
19 The SAB recommends that the authors consider summarizing and displaying the Report's conclusions in
20 matrix form. A well designed matrix could have several advantages as it would better communicate: the
21 evidence underlying each conclusion, the uncertainty for a given conclusion across different functions
22 (i.e., source, sink, refuge, lag, and transformation), and the confidence in conclusions across different
23 system types (e.g., streams versus adjacent wetlands). The SAB also recommends including in the
24 Report brief characterizations of the temporal or spatial scales over which given functions or phenomena
25 occur and their sizes, intensities, and effects. Use of graphical methods to convey the level of confidence
26 in the Report's conclusions, e.g., similar to Intergovernmental Program on Climate Change report (IPCC
27 2007) would also help to better communicate findings. For example, conclusions drawn at broad
28 regional scales could have a high level of certainty and conclusions drawn for an individual site at a
29 local scale could have lower certainty.

30
31 *Case Studies and Context*

32
33 The SAB finds that it is difficult to discern the intended illustrative points of the Report's case studies
34 within the broader discussion of streams in Chapter 4. The case studies should be presented earlier and
35 the SAB suggests that text boxes should be used to present the findings of case studies within the main
36 body text. Highlighting the key point of each of the longer case studies would make them more
37 impactful. In addition, the SAB also finds that some case study conclusions appear to be overreaching,
38 such as for arid streams. In this case, real-world management scenarios can contrast greatly with the
39 situations described in this particular case study.

40
41 For the summary conclusions in case studies, the SAB recommends that the authors consider
42 distinguishing flow-, geology- and climate-dependent conclusions that integrate with the broader more
43 general conclusions provided elsewhere. As previously mentioned, the SAB finds that conclusions for
44 the case studies could be improved by being explicit about how human activities alter (both increase and
45 decrease) above and below ground connectivity of streams with downstream waters, ideally through the
46 use of specific examples (e.g., perhaps using the Report's existing case studies). The SAB notes that
47 each case study has its own unique bulleted list of conclusions, which makes it difficult to draw

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1 conclusions across the case studies or to relate individual case studies to the Report's general
2 conclusions.

3
4 *Consistent Statement of Conclusions throughout the Text*

5
6 The SAB also notes that it is essential that descriptions of functions and linkages in the Report be
7 consistently and succinctly stated in Section 4.6 "Streams: Synthesis and Implications," (pages 4-35 and
8 4-36) and Section 1.4.

9
10 *Recommendations*

- 11
- 12 • Statements in the Report that support conclusions about the connectivity of streams should be
13 expressed in quantitative terms wherever possible. Descriptions of functions and linkages should be
14 consistently and succinctly stated in Section 4.6 (pages 4-35 and 4-36) of the Report "Streams:
15 Synthesis and Implications" and Section 1.4.
 - 16
 - 17 • The SAB suggests that the EPA could consider summarizing and displaying the Report's
18 conclusions in matrix form, including brief characterizations of the temporal or spatial scales over
19 which given functions or phenomena occur, and their sizes, intensities, and effects.
 - 20
 - 21 • The EPA's report should analyze the scientific literature and discuss how differences in flows affect
22 connectivity. emphasizing key linkages and exchanges that influence the magnitude and frequency
23 of connectivity such as ground water-surface water interactions, flooding or other episodic events,
24 and the influence of riparian zones and also how these linkages influence biota and food webs and
25 vice versa. The conclusions in the Report should then reiterate how these linkages and exchanges
26 influence physical, chemical, and biological connectivity with downstream systems.
 - 27
 - 28 • The conclusions concerning ephemeral streams should be strengthened by: (1) adding text that
29 describes spatial and temporal variations in linkages of ephemeral streams with downstream waters;
30 (2) summarizing existing evidence of the frequency of these connections; (3) identifying where
31 further research needed; and (4) clarifying how and when ephemeral headwaters provide critical
32 habitat and corridors for biota to move among and within their habitats associated with downstream
33 waters.
 - 34
 - 35 • Text should be added to the Report to explain how hydrologic connectivity in both directions can
36 sustain aquifers. Alluvial systems in the southwest and karst systems in the eastern U.S. should be
37 used as examples that influence the physical, chemical, and biological integrity of downgradient
38 waters.
 - 39
 - 40 • The summary of chemical functions that has been included in the Report should include details
41 about the ways that headwater streams influence sediment-bound nutrients, dissolved organic matter
42 (DOM), and contaminants.
 - 43
 - 44

1 **3.5. Waters and Wetlands in Floodplain Settings: Review of the Literature**

2
3 *Charge Question 4(a). Section 5.3 of the Report reviews the literature on the directional*
4 *(downstream) connectivity and effects of wetlands and certain open waters subject to non-tidal,*
5 *“bidirectional” hydrologic flows with rivers and lakes. Please comment on whether the Report*
6 *includes the most relevant published peer reviewed literature with respect to these types of*
7 *wetlands and open waters. Please also comment on whether the literature has been correctly*
8 *summarized. Please identify any published peer reviewed studies that should be added to the*
9 *Report, any cited literature that is not relevant to the review objectives of the Report, and any*
10 *corrections that may be needed in the characterization of the literature.*

11
12 The SAB generally finds that literature on the connectivity of waters and wetlands in floodplain settings
13 included in the report is fairly limited in scope (i.e., focused largely on headwater riparian wetlands) and
14 should be expanded to adequately address this important type of connectivity. That said, the literature
15 reviewed does substantiate the conclusion that, in an overwhelming number of cases, floodplains and
16 waters and wetlands in floodplain settings support the physical, chemical, and biological integrity of
17 downstream waters. Additional emphasis, discussion, and reorganization of the information presented
18 (and in some cases review of more recent and diverse literature) is needed to address the significance of
19 multi-dimensional connectivity.

20
21 **3.5.1. Structure of Section 5.3 of the Report**

22
23 Chapter 5 of the Report addresses the physical, chemical, and biological connections of wetlands to
24 rivers. Section 5.3 focuses on wetlands in riparian and floodplain settings and covers a wealth of topics.
25 The Section could be strengthened by reorganizing the information presented, incorporating key
26 literature that is now missing and, as with other sections, by technical editing of both the text and
27 glossary.

28
29 The SAB recommends that Section 5.3 of the Report be reorganized to clarify the functional role of
30 floodplain systems in maintaining the ecological integrity of streams and rivers. Much of the text in
31 Section 5.3 is focused on headwater riparian wetlands and the importance of headwater, streamside areas
32 to in-stream structure and function. As written, Section 5.3 of the Report is 16 pages in length, with only
33 6 pages that focus specifically on floodplain dynamics. The SAB recommends that the material on low
34 order stream riparian areas be moved from Section 5.3 to Chapter 4, which discusses the physical,
35 chemical, and biological connections of low order streams and riparian areas (see also recommendations
36 in Section 3.3.8 of this review). In particular, the material in Sections 5.3.1 and 5.3.2, which focus on the
37 physical and chemical influence of riparian areas, is more appropriately located in Chapter 4. Chapter 4
38 already includes discussions of the role of riparian forests in regulating water temperature and providing
39 inputs of large woody debris, but leaves the discussion of other functions, such as ability of these areas
40 to act as nutrient sinks and transformers, to Chapter 5. Consolidating the entirety of the literature review
41 on the dynamics of low-order stream riparian areas into Chapter 4 would help organize and clarify the
42 text. This will leave the emphasis of Section 5.3 on the structure and function of larger river systems,
43 particularly floodplains and their lateral dimensions. This will also require editing throughout the report
44 for consistency so that the use of headwater riparian terminology is separated from discussion of waters
45 and wetlands in floodplain settings as much as possible.

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1 The EPA should also consider reorganizing the information on the different taxonomic groups (plants
2 and phytoplankton, vertebrates, and invertebrates) that are described in Sections 5.3.3.1-5.3.3.3 of the
3 Report to integrate the functional attributes of floodplains as habitats, rather than addressing each group
4 separately, textbook style (Amoros and Bornette 2002).

5
6 *Recommendations*

- 7
- 8 • Section 5.3 of the Report should be reorganized by moving the text on low-order riparian areas and
9 the role of headwater, streamside areas on in-stream structure to Chapter 4 of the Report. Section 5.3
10 should focus on the functional role of floodplains in higher-order rivers and the literature review
11 should more fully reflect the physical, chemical and biological linkages between floodplains and
12 receiving waters (i.e., lateral exchange between floodplains and rivers followed by downstream
13 transport) within riverscape (*sensu* Wiens 2002) and riverine landscape (*sensu* Ward et al. 2002,
14 Thorp 2006) perspectives.
 - 15
 - 16 • EPA should consider reorganizing the information on the different taxonomic groups (plants and
17 phytoplankton, vertebrates, invertebrates) that are described in Sections 5.3.3.1-5.3.3.3 of the Report
18 to integrate the functional attributes of floodplains as habitats, rather than addressing each group
19 separately.
 - 20
 - 21 • The EPA should also consider reviewing the following additional selected on references on fauna in
22 waters and wetlands in riparian/floodplain settings: Brooks et al. (2013); Baxter et al. (2005);
23 Bestgen et al. (2006); Bestgen et al. (2007); Bottom et al. (2005); Fausch (2010); Flecker et al.
24 (2010); Gresswell (2011); Koel et al. (2005); McIntyre et al. (2007); Mion et al. (1998); Modde et al.
25 (2001); Modde et al. (2005); Schick and Lindley (2007); Spinola et al. (2008); and Zelasko et al.
26 (2010).

27
28 **3.5.2. Terminology in Section 5.3 of the Report**

29
30 A broad view of the ecological and functional roles of floodplains, irrespective of their regulatory status,
31 allows a more representative cross section of the literature to be included. This approach is consistent
32 with including a wide range of wetlands (Cowardin et al. 1979) rather than exclusively those meeting
33 the federal regulatory definition. The Report should contain a statement that the text refers to riverine
34 landscape settings in their entirety, with its characteristic four-dimensions of connectivity (Ward 1989);
35 however, the SAB also recommends that the authors clearly indicate these areas are covered in the
36 report because of functional linkages and not policy goals.

37
38 The SAB recommends that “bidirectional” wetlands on floodplains be called “waters and wetlands in
39 floodplain settings. (“Unidirectional” wetlands as defined in the EPA Report are discussed in Sections
40 3.7 and 3.8 of this SAB report.) This change in terminology is needed to acknowledge the multi-
41 dimensional flux of water and materials between floodplains and riparian areas and their associated
42 rivers and streams. Consistent use of these terms is important for clarity, as the inconsistent uses of
43 “riparian/floodplain wetlands,” “riparian areas,” or “floodplains” in some sections of Chapter 5 is
44 confusing. The definitions of “Riparian Area,” “Riparian Wetland,” “Floodplain,” “Floodwater,” and
45 “Floodplain Wetland” in the glossary of the Report should also be revised to be consistent.

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1 *Recommendations:*
2

- 3 • The Report should discuss the functional role of floodplains and riparian areas regardless of their
4 regulatory status. However, it should be made clear that this discussion does not imply an expansion
5 of the definition of waters and wetlands under the jurisdiction of the Clean Water Act.
6
7 • The terms “unidirectional” and “bidirectional” wetlands should be revised to reflect the landscape
8 position of the water body and/or wetland in question. Thus, it is recommended that “bidirectional”
9 wetlands be called “waters and wetlands in floodplain settings.”
10
11 • The definitions of “Riparian Area,” “Riparian Wetland,” “Floodplain,” “Floodwater” and
12 “Floodplain Wetland” in the glossary of the Report should align with the ways the terms are used in
13 the text.
14

15 **3.5.3. Spatial and Temporal Connectivity of Floodplain Environments to River**
16 **Systems**
17

18 Spatial and temporal connectivity between the stream and floodplain are the primary determinants of
19 physical and biological processes occurring within both the stream and the floodplain (e.g., Junk et al.
20 1989). Thus, Section 5.3 of the Report should include a new subsection that explicitly discusses how
21 floodplain environments (including the terrestrial components thereof) are functionally linked to river
22 systems, both spatially and temporally, for example, by means of the lateral “flood pulse” for surface
23 water connections, and vertical connections to alluvial aquifers. The more current, integrated view of
24 “riverscapes” (Wiens 2002) and “riverine landscapes” (Ward et al. 2002, Thorp et al. 2006) as a mosaic
25 of patches that are shaped by the four components of connectivity at the habitat, floodplain, and river
26 corridor scales, as well as disruptions caused by drought, could also be addressed here. This riverine
27 landscape perspective (Ward et al. 2002, Thorp et al. 2006) can provide the organizational backbone of
28 the subsection, stressing higher order river structure and function while recognizing that there exist
29 gradients of floodplain development along the drainage network. Although the flood pulse concept is
30 acknowledged in the Report as a fundamental paradigm in river ecology (p. 5–6, line 5; page 6–4, lines
31 1-2), the conceptualization and hydrologic character of floodplain wetlands in either spatial or temporal
32 dimensions remain undeveloped. The Report also recognizes the extension of the flood pulse concept to
33 include “flow pulses” (Tockner et al. 2000) but does little to recognize how riverine landscapes
34 (including floodplains and the wetlands within them) function through storm-related changes in flow,
35 seasonal variation in water abundance and river discharge, and longer-term changes related to climate
36 shifts and precipitation regimes. The references to “flood pulse” in the Report are limited, relating to
37 flood attenuation in the main channel (p. 5–6, lines 5, 29; Table 5–3, page 5–38), or the influence of the
38 flood pulse on biological entities (e.g., page 5–20, lines 16, 22, 29). The concept of riverine landscapes
39 is not discussed, but could be a strong organizational framework.
40

41 Short duration high intensity flood events for surface waters and long duration low intensity lateral
42 discharge for ground water need additional emphasis, including descriptions of the influence of the
43 flooding on residence time of surface water, seasonal exchanges with ground water, chemical and
44 biological linkages, and ecosystem processes. For example, low frequency, high-intensity flood events
45 on downstream waters chiefly affect physical connectivity, including water storage, peak flow
46 attenuation, and sediment and wood transport and/or deposition. This occurs on a decadal or centennial
47 return interval and the spatial scale of this type of flood event tends to be extensive, dictated largely by

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1 topography, and covering all available habitats. At the other end of the spectrum, the effects of high-
2 frequency low-intensity forms of connectivity (such as hyporheic ground water flow) may drive
3 biological or biogeochemical functions, including nutrient and contaminant transformation and organic
4 matter accumulation. The spatial scale of this type of connectivity depends on whether ground water
5 discharge in the floodplain is discrete (e.g., an alluvial spring) or diffuse, and whether it travels through
6 the floodplain as channelized flow or in the hyporheic zone. The role of ground water movement and
7 storage, including the effects of flood pulses on the hydrologic differences between, for example,
8 “slope” (primarily ground water fed) and “riverine” (primarily surface water fed) wetlands (per the
9 hydrogeomorphic classification scheme; Brinson 1993), and the role of chemical/contaminant
10 movement and storage related to ground water systems in floodplains, have been quantified via flow and
11 transport modeling, using both steady-state and transient analysis to simulate temporal changes.

12
13 Finally, the potential for drought to disrupt connectivity by reducing water availability and disrupting
14 hydrologic connectivity should be acknowledged. In this way, drought has both direct and indirect
15 effects, including the loss of available habitat, changes in water quality, and alterations in the strength
16 and structure of species interactions (Lake 2003). Climate change is expected to exacerbate the impacts
17 of drought by increasing the frequency and intensity of low flows (van Vilet and Zwolsman 2008).

18
19 Placing floodplain wetland environments into the context of the “riverine landscape” requires a
20 perspective of the linkage and expansion of these environments associated with lateral flows caused by
21 flood events. The authors of the Report need to clearly articulate the “bidirectional” nature of fluxes and
22 connections back to the river channel, focusing on the fluxes of water, materials, and biota and
23 emphasizing how exchange flows respond to the temporal progression of the flood pulse and move back
24 to the channel. This will reflect flowpaths described in the conceptual model shown described in Section
25 3.2 of this SAB report. As such, Section 5.3 of the EPA Report should stress the effects of floodplains
26 not only on river flows, but also on chemistry, sediments, and biota of downstream waters. The SAB
27 provides a number of specific recommendations in this regard. Flood-forecasting methods could be used
28 as a means to quantify the strength of connectivity (spatial and temporal) between floodplains and rivers.
29 Hydrological methods in flood frequency – floodplain inundation provide estimates of water residence
30 time (or hydroperiod) on floodplains, with implications for fluxes of biota and biogeochemical
31 processing, for example, of nitrogen (N) and phosphorus (P). The results are measures of vertical and
32 lateral connectivity. Analyses of this kind require that recurrence intervals be explicitly defined, for
33 example making estimates over a reasonable range of overbank flows (2 years out of 3, to 10-yr and
34 100-yr events), to establish variability in the time scales of connectivity. Such analyses would focus
35 much needed attention on magnitude-frequency relationships.

36
37 The EPA should consider incorporating into the Report examples of floodplain classification systems
38 (e.g., Nanson and Croke 1992) that would address floodplain geomorphological and functional diversity
39 and place emphasis on the continuum of floodplains along stream networks. This would lead to a better
40 understanding of factors that shape the degree of connectivity between floodplains and receiving waters
41 by describing floodplain/channel geomorphology and the duration of flooding or saturation. The SAB
42 also recommends addressing flood frequency-floodplain inundation science as a means to estimate the
43 degree of connectivity. Channel migration zones (Rapp and Abbe 2003, Brummer et al. 2006), which
44 describe the movement of channels within floodplains and their valley floors over time, explain the
45 variable nature of connectivity (in space and time) of floodplains and the waters/wetlands that they
46 contain. In one year a floodplain can exist on one side of the channel and the next year, following a large
47 flood, the active channel may have migrated 100 meters to the opposite side, stranding the former

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1 floodplain and creating new floodplains on that side. Thus floodplains, including wetlands, are
2 temporally variable and transient, and connectivity could include what has been referred to as the
3 “channel migration zone.” Some states have promulgated regulations about how to define and protect
4 (regulate development) channel migration zones that are non-floodplain portions of the valley floor.
5

6 The Report should emphasize the importance of floodplain connections and processes such as sediment
7 movement, erosion and deposition that operate through downstream, lateral, vertical and temporal
8 dimensions. Additional literature should be reviewed and cited in Section 5.3 of the Report to
9 demonstrate that lateral connections create a diversity of lotic, semi-lotic and lentic habitats within the
10 riparian zone, supporting a wide array of taxa (e.g., fish, amphibians, birds, mammals) and high levels of
11 diversity. The SAB has provided some references (cited below) that address the role of wetlands and
12 off-channel waters on floodplains as fish nurseries that act to populate downstream fisheries. These
13 references include studies describing fish species that spawn and rear in backwaters and floodplain
14 wetlands that flood during high-water seasons, then dry down as flows decrease. As previously noted,
15 these habitats are particularly important for fish larvae. Similarly, some endangered fishes have been
16 shown to use backwaters extensively for spawning and rearing (e.g., Modde et al. 2001; 2005; Bestgen
17 et al. 2007). The Report would be strengthened by discussing the importance of these floodplain habitats
18 and their multi-dimensional connectivity.
19

20 The SAB also finds that it would be instructive to broaden the range of examples used in the Report and
21 make it more representative of the U.S. as a whole. For instance, the EPA could incorporate studies on
22 peatlands in floodplain settings that have “bidirectional” flows, as in northern tier states and Alaska.
23

24 The SAB recommends that the EPA consider reviewing the following selected references (and others
25 that are similar) to document how the hydrologic phenomenon of the flood pulse links rivers to the
26 floodplain (and consequently to wetlands within them): Alford and Walker (2013); Anderson and
27 Lockaby (2012); Benke et al. (2000); Bunn et al. (2006); Ellis et al. (2001); Galat et al. (1998); Granado
28 and Henry (2014); Heiler et al. (1995); Henson et al. (2007); Hudson et al. (2012); Hudson et al. (2013);
29 Magana (2013); Nanson and Croke (1992); Opperman et al. (2010); Power et al. (1995a,b); Powers et al.
30 (2012); Rooney et al. (2013); Schramm and Eggleton (2006); Sullivan and Rodewald 2012; Sullivan
31 and Watzin (2009); Thorp et al. (2006); Tockner et al. (2000); Toth and van der Valk (2012); and Valett
32 et al. (2005).
33

34 *Recommendations:*
35

- 36 • Section 5.3 of the Report should contain a new subsection that explicitly discusses how floodplain
37 environments (including the terrestrial components thereof) are intimately linked to river systems,
38 both spatially and temporally, by means of the “flood pulse” and recent extensions thereof. The
39 “riverine landscape” framework should be employed as the conceptual backbone of the new
40 subsection, stressing dynamic lateral connections between the floodplain (surface and ground water)
41 and downstream waters, recognizing the full range of temporal and spatial variability (i.e., short
42 duration high intensity floods for surface waters, long duration low intensity lateral discharge for
43 ground water, drought.)
44
- 45 • Section 5.3 of the Report should emphasize the effects of floodplains not only on river flows, but
46 also on hydrological connections and processes affecting biota, chemistry, and sediment movement
47 through downstream as well as lateral, vertical and temporal dimensions. Flood-forecasting methods

1 could be used as a means to quantify the strength of connectivity (spatial and temporal) between
2 floodplains and rivers.

- 3
- 4 • The EPA should consider incorporating into the Report examples of floodplain classification
5 systems to address the geomorphological and functional diversity of floodplains, and to place
6 emphasis on the continuum of floodplains along stream networks. Channel migration zones, which
7 describe the movement of channels within floodplains over time as a result of large floods, could be
8 used to demonstrate the variable nature of connectivity (in space and time) of floodplains and the
9 waters/wetlands that they contain.
- 10
- 11 • Additional literature should be reviewed and cited in the Report to demonstrate that lateral
12 connections create a diversity of lotic, semi-lotic and lentic habitats, supporting a wide array of taxa
13 (e.g., fish, amphibians, birds, mammals) and high levels of diversity. More emphasis is needed in
14 Section 5.3 of the Report on these biotic exchanges.
- 15
- 16 • The range of examples used in the Report could be broadened to make it more representative of the
17 U.S. as a whole. For instance, the EPA could incorporate studies on peatlands in floodplain settings
18 that have “bidirectional” flows, as in northern tier states and Alaska.
- 19
- 20 • The EPA should consider reviewing the additional references identified above.

21 **3.5.4. Chemical Linkages**

22 Wetlands and floodplains serve as sinks, sources and transformers of nutrients and other chemical
23 contaminants, and have a significant impact on the physical, chemical, and biological integrity
24 (including ecosystem productivity) of downstream waters. The primary driver of chemical linkages is
25 ecosystem biogeochemistry, which involves the exchange or flux of materials between living and non-
26 living components. These fluxes involve interaction of complex physical, chemical, and biological
27 processes in various components of the ecosystem. Biota (plants, microbes, and fauna) can be considered
28 as exchange pools, which are small in size and undergo rapid turnover and cycling. Abiotic components
29 of wetlands and floodplains (e.g., soil), which are large in size, undergo slow turnover and provide long-
30 term storage similar to a reservoir. The amount of a given constituent in these pools depends on its
31 residence time. It is important to acknowledge these issues in the Report.

32
33
34
35 The SAB recommends that the authors of the Report provide a more recent and diverse assessment of
36 the biogeochemical implications of exchange flows. This can be accomplished by enhancing the review
37 of the literature on the role of wetlands and floodplains as sources, sinks, and transformers of materials
38 including: nutrients, metals, organic contaminants, and sediments. The Report sections on microbial
39 nitrogen processing (denitrification), phosphorus cycling, and sediments (including legacy sediments
40 and associated chemicals) could be strengthened with an expansion of the literature reviewed. The
41 review on nitrogen processes in Section 5.3.2.2 of the Report is of particular concern due to its very
42 heavy reliance on a single paper by Vidon et al. (2010), cited fully 20 times in that section, on the fate
43 and fluxes of nitrogen in riparian areas. There is an extensive literature on this subject and while the
44 Report correctly characterizes nitrogen transformations in a general sense, there are many key references
45 that are not included. For example, the Report should be updated to provide a more recent and diverse
46 assessment of biogeochemical implications of “hot-spots and hot-moments” in nitrogen fluxes that are
47 associated with hydrologic exchanges between surface and subsurface waters, and the residence time of

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1 water in those locations (McClain et al. 2003; see also extensive work by Groffman et al. 2003). This
2 information may best be located in Chapter 4 with the review of low order riparian zones. The SAB also
3 recommends that, in general, the literature findings in this section (as in much of the Report) be more
4 quantitative and not reported by simple qualitative statements indicating, for example, that nitrogen
5 levels increased or decreased. In this specific example the Report should indicate the percent
6 concentration change. The SAB notes that, depending on hydrologic connectivity and water residence
7 time, riparian/floodplain soils exhibit a range of redox conditions, which then regulate biogeochemical
8 cycling of key nutrients, metals, and organic compounds.

9
10 The Report should indicate that changing climatic conditions may stimulate or alter rates, fluxes and
11 storage pools of key elements (carbon, nitrogen phosphorus, and sulfur) involved in biogeochemical
12 processes and services provided by wetlands. For example, accelerated decomposition of organic matter
13 can potentially increase nutrient generation, which may lead to increased nutrient/contaminant loading
14 to adjacent water bodies. Important inorganic elements in wetlands are mobile and thus their
15 concentrations may increase upon flooding and drainage cycles, water withdrawals, sea level rise, and
16 increases in temperature. The bioavailability of many inorganic elements required for key biological
17 processes (e.g., plant growth and decomposition) will respond to these changing conditions. Drainage
18 also increases enzyme and microbial activities, which facilitates oxidation of organic matter, leading to
19 subsidence and loss of organic soils. Many studies have shown that oxidation of organic matter in
20 wetlands is dependent on water-table depth, temperature, nutrient loading, vegetation communities and
21 release of nutrients. “Bidirectional” exchange of particulate organic matter (POM) and dissolved organic
22 matter (DOM) in floodplains can be an important source of POM and DOM to streams and rivers.
23 Further treatment of the residence time of water could also be considered. Water residence time is a
24 critical concept that can have significant biological impacts, which can be particularly relevant to
25 downstream waters. Powers et al. (2012) point out that aquatic ecosystem components that have
26 relatively high nutrient processing rates may not contribute substantially to total ecosystem retention
27 unless enabled by hydrological connections.

28
29 The SAB recommends that the EPA consider reviewing the following selected references on
30 biogeochemistry as support to the Report: Aitkenhead-Peterson, et al. (2003); Fowler (2004); Bridgham
31 et al. (2001); Bridgham et al. (2006); Buresh et al. (2008); Fennessy and Cronk (1997); Freeman et al.
32 (2000a); Freeman et al. (2004b); Hefting et al.(2004); Osborne (2005); Qualls and Richardson. (2003);
33 Reddy et al. (1999); Reddy et al. (2005); Reddy et al. (2011); Strack et al. (2008); Wetzel (1990); and
34 Wetzel (2002).

35
36 *Recommendations:*

- 37
- 38 • The Report should provide a more recent and diverse assessment of the chemical implications of
39 exchange flows. This can be accomplished by enhancing the review of the literature on the
40 biogeochemistry of wetlands and floodplains, and their role as sources, sinks, and transformers of
41 materials including: nutrients, metals, organic contaminants, and sediments (additional references
42 are provided in section 3.5.8 of this SAB report). The Report could also further discuss how
43 changing climatic conditions may stimulate or alter rates, fluxes and storage pools of key elements
44 (carbon, nitrogen phosphorus, and sulfur) involved in biogeochemical processes and services
45 provided by wetlands (additional references are provided in section 3.5.8 of this SAB report).
- 46

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- 1 • The EPA should consider reviewing the selected references on biogeochemistry identified above
2 (and others that are similar) as support to the Report.
3
- 4 • The Report sections on nitrogen processing (denitrification), phosphorus cycling, and sediments
5 (including legacy sediments and associated chemicals) should be strengthened by expanding the
6 literature reviewed. In particular, Section 5.3.2.2 of the Report should be updated to provide a more
7 recent and diverse assessment of biogeochemical implications of “hot-spots and hot-moments” in
8 nitrogen fluxes that are associated with residence time and hydrologic exchanges between surface
9 and subsurface waters (Groffman et al. 2003; McClain et al. 2003). In particular, the EPA should
10 consider including in the Report further discussion of the residence time of water. Water residence
11 time is a critical concept that can have significant biological impacts, which can be particularly
12 relevant to downstream waters (additional references are provided in section 3.5.8 of this SAB
13 report).
14
- 15 • The EPA should consider strengthening the Report by reporting the literature findings more
16 quantitatively and not by simple qualitative statements, for example, that nitrogen levels increased or
17 decreased.
18

19 **3.5.5. Export versus Exchange**

20
21 Floodplains and waters and wetlands in floodplain settings are shaped by repeated inundation,
22 saturation, erosion and deposition of sediment, and movement of biota. Water and materials flow
23 laterally between floodplains and rivers (i.e., receiving waters), moving onto the floodplain in periods of
24 high flows and back to the channel as floods recede. As mentioned above, the Report text as written
25 does not clearly articulate the multi-dimensional nature of connectivity between the floodplain and
26 channel. The SAB recommends strengthening the focus of the Report on the fluxes of water, materials
27 and biota to emphasize how exchange flows respond to the temporal progression of the flood pulse.
28

29 *Recommendation*

- 30
31 • There should be a stronger focus in the Report on the multi-directional fluxes of water, materials and
32 biota to emphasize how exchange flows respond to the temporal progression of the flood pulse.
33

34 **3.5.6. Case Studies**

35
36 The SAB finds that the report would benefit from more discussion of forested wetlands, including
37 bottomland hardwoods, given their ecological importance, rate of loss, and unique attributes. These
38 wetlands represent a significant portion of remaining U.S. wetlands. A box case study could address
39 this gap, and include the role of bottomland forests on river biogeochemistry and flood storage.
40

41 *Recommendation*

- 42
43 • It would be useful to include in the Report a box case study of the role of forested wetlands
44 (including bottomland hardwoods) in river biogeochemistry and flood storage.
45
46
47

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1 **3.5.7. Human Impacts to Floodplains and Aggregate Effects**

2
3 The effect of human impacts to waters and wetlands in floodplain settings on connectivity is an
4 important issue that should be addressed in the Report. An example of such an impact is channel
5 incision or levee construction that breaks the link between floodplain waters and wetlands with
6 downstream waters. Alterations that decrease the connectivity of floodplains and waters and wetlands in
7 floodplain environments provide some of the clearest demonstrations of the functional role of these
8 areas with respect to downstream waters (for example, through degraded water quality as urban and
9 agricultural runoff increases, leading to downstream sediment and nutrient enrichment). A key approach
10 to this analysis is to provide examples of the aggregate effects of watershed land use change and
11 floodplain impacts on downstream waters in terms of flooding, biodiversity, and materials flux
12 (Barkesdale et al. 2013). The water quality benefits of riparian areas and floodplains should also be
13 highlighted in the Report by explicitly pointing out that their destruction exacerbates nutrient runoff
14 from agricultural lands by reducing or eliminating nutrient uptake, denitrification, and sedimentation
15 of adsorbed phosphorus.

16
17 *Recommendations (arranged in order of priority, from higher to lower):*

- 18
- 19 • The Report should address the effects of human impacts to waters and wetlands in floodplain
20 settings on connectivity.
- 21
- 22 • The water quality benefits of riparian areas and floodplains should be highlighted in the Report by
23 explicitly pointing out that their destruction exacerbates nutrient runoff from agricultural lands by
24 reducing or eliminating nutrient uptake, denitrification, and sedimentation of adsorbed
25 phosphorus.
- 26
- 27 • The EPA should consider reviewing the following references on human impacts as support to the
28 Report: Dudley and Platania (2007); and Verhoeven et al. (2006).
- 29

30 **3.6. Waters and Wetlands in Floodplain Settings: Review of the Findings and Conclusions**

31
32 *Charge Question 4(b). Conclusion (2) in section 1.4.2 of the Report Executive Summary*
33 *discusses major findings and conclusions from the literature referenced in Charge Question 4(a)*
34 *above. Please comment on whether the conclusions and findings in section 1.4.2 are supported*
35 *by the available science. Please suggest alternative wording for any conclusions and findings*
36 *that are not fully supported.*

37

38 **3.6.1. Scientific Support for the Findings and Conclusions Concerning Waters and Wetlands in**
39 **Floodplain Settings**

40
41 The SAB finds that there is strong scientific support for the conclusion that floodplain water bodies and
42 wetlands are highly connected to downstream waters through multiple pathways, including hydrological,
43 chemical, and biological connectivity. However, as further discussed below, the SAB recommends that
44 additional literature be included in the Report to bolster these findings, particularly as related to
45 chemical and ground water connectivity. In addition, the SAB notes that the key findings and
46 conclusions presented in Section 1.4.2 of the executive summary of the Report should be directly related
47 to the information presented in Section 5.3 on Floodplain Wetlands. The discussion of findings and

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1 conclusions in these two sections should be parallel. Any conclusions presented in Section 1.4.2 of the
2 executive summary should also align with conclusions presented in Sections 5.5, the wetlands synthesis
3 and implications discussion, and 6.1, the discussion of major conclusions.

4
5 The SAB recommends that the EPA Report discuss river-floodplains as integrated ecological units,
6 following riverscape (*sensu* Wiens 2002) and riverine landscape (*sensu* Ward et al. 2002, Thorp 2006)
7 perspectives. Currently, many of the conclusions in the Report are drawn from literature related to non-
8 floodplain riparian zones (i.e., headwater riparian zones), which potentially undermines the ability to
9 speak to connectivity between waters and wetlands in floodplain settings and receiving systems. Thus,
10 the SAB recommends replacing the current riparian focus with a discussion focused on the science of
11 larger river (i.e., high-order) floodplain systems, and moving the riparian focus to Chapter 4, where the
12 focus can largely remain on the dynamics of low-order streams.

13
14 *Recommendations (arranged in order of priority, from higher to lower):*

- 15
- 16 • There is strong scientific support for the conclusion that waters and wetlands in floodplain settings
17 are highly connected to receiving waters through multiple pathways including hydrological,
18 chemical, and biological connectivity. However, a broad discussion of river-floodplain systems as
19 integrated ecological units should replace the current headwater riparian focus and be included in
20 Section 5.3 of the Report. The riverine landscape framework (Ward et al. 2002, Thorp et al. 2006)
21 should be employed as the conceptual backbone of the section. Additional literature should be
22 included in the Report to bolster findings as related to chemical and ground water connectivity.
23
 - 24 • Key findings and conclusions presented in Section 1.4.2 of the executive summary of the Report
25 should be directly related to the information presented in Section 5.3 on Floodplain Waters and
26 Wetlands. Conclusions presented in Section 1.4.2 of the executive summary should also align with
27 conclusions presented in Sections 5.5, the wetlands synthesis and implications discussion, and 6.1,
28 the discussion of major conclusions.

29
30 **3.6.2. Additional Recommendations for the Findings and Conclusions for Waters and Wetlands**
31 **in Floodplain Settings**

32
33 The SAB recommends that the EPA address the following issues in the discussion of waters and
34 wetlands in floodplain settings.

35
36 *Inconsistent Terminology*

37
38 As previously mentioned, the Report language should remain consistent both within the key findings
39 and conclusions sections as well as throughout Section 5.3. The terms “riparian areas,” “riparian and
40 floodplain areas,” and “riparian/floodplain waters” are used inconsistently in Tables 5.1 and 5.3. The
41 SAB encourages consistent use of these (and other) terms and suggests providing clarification of the
42 differences among them in the definitions. The SAB notes that the glossary definitions in the Report
43 distinguish between “riparian areas” and “riparian wetlands” as well as among “floodplain,”
44 “floodwater,” and “floodplain wetland.” “Upland” is also defined in the glossary as: (1) *Higher*
45 *elevation lands surrounding streams and their floodplains.* (2) *Within the wetland literature, specifically*
46 *refers to any area that is not a water body and does not meet the Cowardin et al. (1979) three-attribute*
47 *wetland definition.* These are examples of the use of multiple definitions that, while not incorrect, are

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1 sufficiently different to potentially cause confusion. Most importantly, as previously discussed, the SAB
2 recommends that “bidirectional” wetlands be called “waters and wetlands in floodplain settings” and
3 that headwater riparian terminology be disentangled from this section to the degree possible. The
4 terminology used in the key findings and conclusions of the Report should align with the glossary
5 definitions and the conceptual framework.

6
7 *Temporal Component*

8
9 As previously mentioned, the key findings and conclusions in the Report should recognize the temporal
10 dimension of waters and wetlands in floodplain settings relative to downstream connectivity, consistent
11 with the four-dimensional nature of the conceptual framework set forth in Chapter 2. Water residence
12 times and the transient nature of floodplains should be key points. This temporal perspective, combined
13 with an emphasis on developing and illustrating the strength of connectivity, could be done using the
14 well-developed science of flood forecasting (probability) as a function of vertical and lateral
15 connectivity. Incorporating discussion of flood frequency-floodplain inundation science into the Report
16 might prove to be effective at for highlighting how hydrologists estimate the degree of connectivity.
17 Brief reference to the flood-pulse and riverine landscape concepts, discussed within the conceptual
18 framework (Chapter 2), would reinforce the functional significance of regular or episodic floodplain
19 inundation.

20
21 Discussion of “channel migration zones”, which describe the movement of channels within floodplains
22 over time as a result of large floods (Rapp and Abbe 2003, Brummer et al. 2006, Washington
23 Department of Ecology 2011), would further address the lateral connectivity of rivers to their valley
24 floors and the variable nature of connectivity in both space and time. The role of ground water
25 movement and storage should also be highlighted. This discussion should include the effects of flood
26 pulses on the hydrologic differences between slope and riverine wetlands and the role of
27 chemical/contaminant movement and storage related to ground water systems in floodplains. These
28 effects have been quantified by flow and transport modeling using both steady-state and transient
29 analysis to simulate temporal changes.

30
31 Overall, the EPA’s conclusions concerning connectivity of waters and wetlands in floodplain settings
32 should reflect the main message of a new spatial and temporal subsection in Section 5.3, as
33 recommended in the SAB response to Charge Question 4(a).

34
35 *Further Quantification of Key Conclusions*

36
37 The key conclusions in the Report should be more empirically and/or more specifically described.
38 Whenever possible, the degree of and/or strength of evidence for connectivity should be quantified (e.g.,
39 of X studies, X% support conclusion of connectivity).

40
41 *Chemical Linkages (including biogeochemical cycling)*

42
43 The role of waters and wetlands in floodplain settings in storing and transforming chemical constituents,
44 including the biogeochemical implications of exchange flows, should be expanded under Key Finding
45 (d) in Section 1.4.2 of the Report. This may require additional literature review (in Section 5.3) in order
46 to refer to literature on floodplain wetlands and water bodies rather than rely on headwater riparian
47 examples. Changes to nutrients (both N and P) and sediments should be easily documented. There is

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1 ample literature on the improved water-quality function of wetlands, and this is the rationale for
2 constructed wetlands. Additionally, there is an opportunity to link the discussion of the role of wetlands
3 and other water bodies in storing and transforming chemical constituents to the regulation and
4 management of chemical contaminants.

5
6 *Biological Linkages Including Food Webs*
7

8 The role of biological connectivity between waters and wetlands in floodplain settings and receiving
9 systems should be further highlighted in the key findings and conclusions. In particular, the SAB
10 encourages the EPA to highlight the point that waters and wetlands in floodplain settings and receiving
11 systems are intimately linked through biological connections (including integrated wetland-river food
12 webs) across a range of spatial and temporal scales. In this regard, the Report should explicitly discuss
13 linkages to downstream waters. For example: “Floodplain wetlands can provide critical nursery habitat
14 for fish, *which then disperse into downstream waters, becoming part of river food webs and serving as a*
15 *biological vector of nutrients.*” There also may be an opportunity to mention the importance of waters
16 and wetlands in floodplain settings to species that are economically important as well as those species
17 that are state and/or federally listed as endangered, but this would have to be first developed in the body
18 of the Report.

19
20 *Export versus Exchange*
21

22 As previously discussed, an “exchange” versus “export” framework (i.e., reciprocal exchanges between
23 waters and wetlands in floodplain settings and receiving waters) should be used in the Report. In this
24 way, the EPA can clearly indicate that multi-directional biological, chemical, and hydrological transfers
25 characterize the connections between the two systems.

26
27 *Case Studies*
28

29 The SAB finds that the case studies in the Report are useful. However, the findings from the case studies
30 should be more explicitly linked to the overall conclusions in Section 1.4 of the Report. Additionally,
31 the SAB finds that the Report would benefit from more discussion of forested wetlands, including
32 bottomland hardwoods, given their ecological importance and their rate of loss. The SAB recommends
33 that key information from case studies be presented in side boxes, with more detailed information
34 included as appendices.

35
36 *Human Impacts*
37

38 In some cases, human alteration of connectivity provides the clearest demonstration of how the function
39 of waters and wetlands in floodplain settings is linked to adjacent waters. Thus, the conclusions in the
40 Report could be strengthened by explicitly mentioning how human activities (impairment as well as
41 restoration) alter connectivity of waters and wetlands in floodplain settings with downstream waters.
42 Mention should be made of alterations that both increase connectivity, such as ditches, and decrease
43 connectivity, such as levees and water extraction activities that reduce the water table. Again, using the
44 flood frequency-lateral connectivity argument, this might represent a strong opportunity to illustrate how
45 diking has clearly diminished connectivity both in individual river segments as well as in the aggregate.
46 Many floodplains along stretches of rivers, if not entire rivers, may be affected by diking. Other

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1 modifications should also be considered, including routine dredging/channelization, which can severely
2 impair (or eliminate) floodplain function.

3
4 *Aggregate/Cumulative Effects*

5
6 The importance of considering waters and wetlands in floodplain settings in the aggregate should be
7 underscored in the key findings and conclusions of the Report. For example, these sections could briefly
8 illustrate how floodplain storage in the aggregate (e.g., floodplains in dozens to hundreds of individual
9 channel reaches) yields many ecological services, including flood attenuation.

10
11 *Recommendations (arranged in order of priority, from higher to lower):*

- 12
- 13 • The key findings and conclusions in the Report should better recognize the temporal dimension of
14 waters and wetlands in floodplain settings relative to downstream connectivity, consistent with the
15 four-dimensional nature of the conceptual framework set forth in Chapter 2. Water residence times
16 and the transient nature of floodplains should be key points. The well-developed science of flood
17 forecasting (probability) as a function of vertical and lateral connectivity may be particularly useful
18 in developing this temporal perspective
 - 19
 - 20 • The role of waters and wetlands in floodplain settings in storing and transforming chemical
21 constituents (i.e., their biogeochemical functions) should be expanded under Key Findings in Section
22 1.4.2 of the Report. The role of biological connectivity between waters and wetlands in floodplain
23 settings and downstream waters should also be further highlighted in the key findings and
24 conclusions.
 - 25
 - 26 • The importance of considering waters and wetlands in floodplain settings in the aggregate, as well as
27 the ways in which human activities (impairment as well as restoration) alter connectivity of waters
28 and wetlands in floodplain settings with receiving waters, should be underscored in the key findings
29 and conclusions of the Report.
 - 30
 - 31 • Report language referring to floodplain waters and wetlands should remain consistent both within
32 the key findings and conclusions sections as well as throughout Section 5.3. The terminology used in
33 the key findings and conclusions of the Report should align with the glossary definitions and the
34 conceptual framework. The findings from the case studies in the Report should be explicitly linked
35 to the overall conclusions.
 - 36
 - 37 • The key conclusions in the Report should be more empirically and/or more specifically described.
38 Wherever possible, the degree of and evidence for connectivity should be quantified (e.g., of X
39 studies, X% support conclusion of connectivity).
 - 40

41 **3.6.3. Alternative Wording for Findings and Conclusions**

42
43 The SAB recommends the following specific revisions to clarify the conclusions in Section 1.4.2 of the
44 Report:

- 45
46 – Section 1.4.2 should consistently refer to “waters and wetlands in floodplain settings.”

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- 1 – Section 1.4.2 should indicate that waters and wetlands in floodplain settings form integral
- 2 components of river food webs.
- 3 – The text in finding c should indicate that waters and wetlands in floodplain settings can reduce
- 4 flood peaks by storing and subsequently releasing floodwaters.
- 5 – The example in finding d appears to be an agricultural best management practice. A more
- 6 relevant example may be provided from the text on page 5-7.
- 7 – In finding e the lead sentence emphasizes ecosystem function but the body of the paragraph
- 8 describes biological connectivity. Finding e should discuss the importance of waters and
- 9 wetlands in floodplain settings to birds, and how birds can spatially integrate the watershed
- 10 landscape.

11
12 **3.7. Waters and Wetlands in Non-floodplain Settings: Review of the Literature**

13
14 *Charge Question 5(a). Section 5.4 of the draft Report reviews the literature on the directional*
15 *(downstream) connectivity and effects of wetlands and certain open waters, including*
16 *“geographically isolated wetlands,” with potential for “unidirectional” hydrologic flows to*
17 *rivers and lakes. Please comment on whether the Report includes the most relevant published*
18 *peer reviewed literature with respect to these types of wetlands and open waters. Please also*
19 *comment on whether the literature has been correctly summarized. Please identify any published*
20 *peer reviewed studies that should be added to the Report, any cited literature that is not relevant*
21 *to the review objectives of the Report, and any corrections that may be needed in the*
22 *characterization of the literature.*

23
24 The SAB finds that the review and synthesis of the literature on the downstream connectivity and effects
25 of “unidirectional” wetlands and open waters in non-floodplain settings is generally thorough,
26 technically accurate, and readable. As previously mentioned, the SAB recommends the authors
27 reconsider use of the terms “unidirectional” and “geographically isolated wetlands” and replace them
28 with non-floodplain wetlands. The SAB finds that the focus on surface water hydrologic connections in
29 Section 5.4 of the Report and elsewhere does not adequately account for important ground water and
30 non-hydrologic biological exchanges that can strongly influence the integrity of downstream waters. The
31 SAB recommends that the Report be reorganized to reflect the types of connections between wetlands
32 and downstream waters via surface water, shallow subsurface flowpaths, shallow or deep ground water
33 flowpaths, or through the movement of biota, with specific attention paid to the magnitude, duration,
34 and frequency of these connections. The SAB recommends that spatial landscape position and scale be
35 considered in the evaluation of the degree of connectivity, given that regional context (e.g., geology,
36 climate, landforms, and surficial sediments) is a major driver of the temporal and spatial scales of
37 hydrologic linkages. Consideration of landscape position and scale will likely provide further
38 justification for treating wetland complexes as aggregates rather than as individual units based on
39 geographic distribution. As previously discussed, the SAB also finds that human alterations of
40 watersheds may change the type of connections as well as the magnitude, frequency, and duration of the
41 connections between non-floodplain waters and downstream ecosystems. The SAB recommends that the
42 draft Report be revised to acknowledge the role of humans in these changes. In addition the draft Report
43 should discuss the differences between manmade wetlands and those found in natural settings.

3.7.1. Summary of the Literature on Non-floodplain Wetlands

The Report captures the most relevant peer-reviewed literature on non-floodplain “unidirectional wetlands” and “geographically isolated wetlands.” While the Report already includes several major review papers, the SAB recommends adding a review paper by Bracken, et al. (2013). The SAB also recommends adding additional citations on biological connections (e.g., Naiman et al 1994; Polis et al. 1997). Other publications on the subject of biological connections are referenced throughout this SAB report. Evidence from the large and growing literature on biological exchanges between non-floodplain wetlands should be included in the Report. In particular, the SAB recommends including literature addressing: the bulk exchange of materials via biota, e.g., energy (Norlin 1967, Mason and MacDonald 1982, Polis et al. 1997, Sabo and Power 2002, Baxter et al. 2005, Spinola et al. 2008, Lowe et al. 2005, Pearse et al. 2011); the movement of nutrients by biota (McCull and Burger 1976, Johnston and Naiman 1987, Davis 2003, Vrtiska and Sullivan 2009); the introduction of disease vectors (Blanchong et al. 2006); the provisioning of habitat essential for biological integrity and completion of life cycles of downstream species (Brooks et al. 1998; Miyazano et al. 2010; Julian et al. 2013).

In addition, the SAB recommends that the EPA review and, if needed, add to the Report the following selected references that are particularly pertinent to the discussion of non-floodplain wetlands: Brunet and Westbrook (2012); Croke et al. (2005); Conly et al. (2001); Fang and Pomeroy (2008); Gray et al. (1984); Hayashi and Van der Kamp (2000); Hayashi et al. (2003); Montgomery (1994); Shaw et al. (2012); Spence (2007); Spence and Woo (2003); Stichling and Blackwell (1957); Thompson et al. (2008); Van der Kamp et al. (2003); Van der Kamp et al. (2008); Wemple et al. (1996); Wemple et al. (2001); Wigmosta and Perkins (2001); Winter and LaBaugh (2003); Woo and Rowsell (1993); and Yang, et al. (2010).

Recommendations

- The literature review in Section 5.4 of the Report is generally thorough, technically accurate and readable; however, the SAB recommends that the review article by Bracken et al. (2013) be added to the Report.
- The SAB recommends including additional literature references (identified above) in the Report to address: bulk exchange of materials via biota, e.g., energy, the movement of nutrients by biota, the introduction of disease vectors, and the provisioning of habitat essential for biological integrity and completion of life cycles of downstream species. Other selected references (identified above) should be reviewed and, if needed, included in the Report.
- The literature review should address the relative degree of connectivity for various non-floodplain wetlands and describe the relative strengths of those connections for those wetlands.

3.7.2. Clarification of Terms in Section 5.4 of the Report

The SAB finds that the term “unidirectional wetlands “ as used in the Report implies on the presence of only one-way hydrologic flows, when in fact, connectivity can have many physical, chemical, and biological dimensions far beyond surface and shallow subsurface hydrologic flowpaths. The SAB suggests that the draft Report’s “uni- and bi-directional” terminology be replaced by terms that better describe landscape position. In this case, “bidirectional wetlands” would be redefined as those within

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1 floodplain settings, and “unidirectional wetlands” as those not within floodplains (i.e., non-floodplain
2 settings). The influence of floodplain and non-floodplain wetlands on downstream connectivity can then
3 be explained in the context of their landscape settings and with respect to the conceptual framework, as
4 described below.

5
6 *Recommendation*

- 7
8 • The terms “unidirectional” and “geographically isolated” wetlands should be replaced in the Report
9 with the term “wetlands in non-floodplain settings.”

10
11 **3.7.3. Recommended Conceptual Framework for Synthesizing Types and Gradients of**
12 **Connectivity**

13
14 As discussed in the response to charge question 2, the SAB recommends the Report be revised to use a
15 conceptual framework with multiple flowpaths that correspond to the multiple dimensions of
16 connectivity. The five functions used to describe connectivity in the Report (i.e., source, sink, refuge,
17 lag, transformation) are differentially affected by the types and characteristics of connections. The
18 framework recommended by the SAB is envisioned as a potential way to map the five functions across
19 different regional settings in order to assess the consequences and relative extent of hydrologic,
20 biological, and beneficial chemical flowpaths provided by non-floodplain (“unidirectional”) wetlands to
21 downstream waters.

22
23 Similarly the SAB recommends that a conceptual model be developed and used to frame the discussion
24 about the type and gradient of various connections between and among floodplain wetlands and non-
25 floodplain wetlands and downstream waters (or “bidirectional” and “unidirectional wetlands,”
26 respectively, using the Report’s original nomenclature). Figure 3 illustrates a conceptual model that the
27 SAB finds to be useful in this regard.

28
29 The multiple dimensions of connectivity to downstream waters include connections provided by surface
30 waters, deep and shallow subsurface ground water, and movement of biota. Each dimension of
31 connectivity should be arrayed as a gradient, as illustrated in Figure 3. This approach could be used to
32 synthesize findings from the literature in terms of the degree of connectivity pathways (e.g., magnitude,
33 duration, frequency⁴) rather than just the presence of any connection. The SAB finds that such an
34 analysis is possible and would be useful for summarizing the effects of such connections in semi-
35 quantitative terms.

36
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⁴ Note that, in this context, frequency, magnitude, and duration apply to all five functions used to describe connectivity in the Report and not to just hydrologic connectivity.

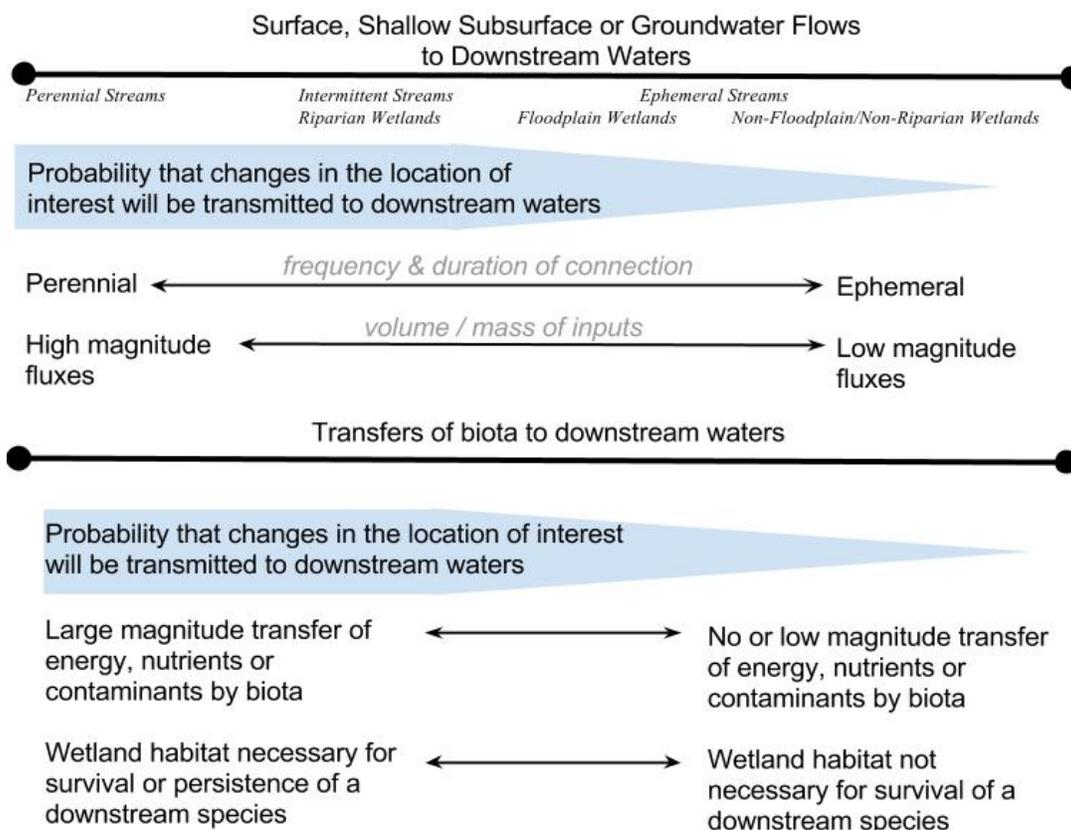


Figure 3: Hypothetical illustration of potential consequences of changes to downstream waters with increases in the magnitude, duration, and frequency of surface and subsurface connections. Connections to all streams including perennial, ephemeral have a connection to downstream waters. Within non-floodplain wetlands the degree of connectivity and its implications for integrity of downstream waters varies considerably.

Recommendations

- When describing connectivity for floodplain and non-floodplain wetlands and certain open waters, the EPA should refer to the conceptual framework the SAB has recommended for the Report (see Section 3.2.3 of this report).
- The EPA should use Figure 3 in this SAB report to frame the discussion of connectivity gradients and their consequences as a function of the magnitude, duration, and frequency of connectivity pathways among floodplain wetlands and non-floodplain wetlands and downstream waters.
- The EPA should identify endpoints for each connectivity gradient, and quantify each connection to the degree possible, and identify research and data gaps.

3.7.4. Temporal and Spatial Scales of Connections among Non-Floodplain Wetlands and Open Waters

Wetlands that are situated alongside rivers and their tributaries are likely to be connected to those waters through the exchange of water, biota and chemicals. As the distance between a wetland and a flowing water system increases, these connections become less obvious. Wetlands that are not contained within river floodplains or stream riparian zones and that lack a permanent surface water connection may still be connected to downstream waters through ground water flowpaths and through the exchange of organisms. These water bodies can become connected to downstream waters during floods or as a result of rising water tables. Whether those connections are sufficient to warrant protections under the Clean Water Act requires that the exchange of water, materials or biota is of sufficient magnitude to impact the physical, chemical, or biological integrity of downstream waters. It is not sufficient to establish the mere existence of a connection, but rather, the magnitude and the impact of those connections should be considered.

The EPA Report suggests that determining the “connectedness” of each non-floodplain wetland must be done on a case-by-case basis. The SAB suggests that the vast majority of non-floodplain wetlands can be classified with respect to some degree of hydrologic, chemical or biological connections to downstream waters; however, some hydrologically and spatially disconnected wetlands may need to be considered on a case-by case basis. The challenge for the EPA is to describe the hierarchy of decisions and the tools necessary to assess the degree of connection necessary to warrant that action.

The SAB recommends that EPA establish relevant guidelines identifying baseline temporal intervals that are likely to connect a non-floodplain wetland to downstream waters. Current technology exists to map these baselines using empirical observations (e.g., use LandSat imagery to map extent of high water regimes ($>2x$ s.d., annual precipitation) versus low water regimes ($<2x$ s.d. annual precipitation), five or ten-year flood return interval, or results of hydrologic models. Such maps would be similar to the Federal Emergency management Agency (FEMA) floodplain maps, and would need to be recalibrated for changing climate and land cover conditions.

For wetlands outside of these flood boundaries, there may still be quite important subsurface or biological connections. The degree of ground water connectivity between a wetland and downstream waters varies considerably. For example, ombrotrophic bogs, which by definition are rain-fed, have minimal ground water connections to downstream waters; while ground water-fed wetlands are clearly exchanging materials with the same ground water systems that feed downstream waters. EPA scientists should consider where along this gradient, the connections are of sufficient magnitude to impact the integrity of downstream waters. This represents an important research need for the agency. Past this threshold, ground water connections will need to be evaluated on a case-by-case basis.

For non-floodplain wetlands where the only significant connection is via the exchange of biota (e.g. the movement of plants and animals between wetlands and rivers), the degree of connection will require an assessment. There is abundant scientific literature documenting that organisms move between these habitats and downstream waters, that these connections are essential for the survival of many species, and that these connections serve to exchange materials across these boundaries; however, there has been insufficient scientific research to date to predict the magnitude of these connections and their effects on downstream ecosystems. A case-by-case evaluation will be required to establish whether these biological connections are of sufficient magnitude to affect the integrity of downstream waters.

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Recommendations

- The Report should recognize that all aquatic habitats have some degree of connection, though they may vary widely in terms of the effects on the integrity of downstream waters. As a result, the Report should assess connectivity in terms of those downstream effects with an emphasis on frequency, magnitude, and duration of connections.

3.7.5. Assessing Wetland Connectivity Based on Aggregate Analysis of Wetland Complexes

Many watersheds have a large number of non-floodplain wetlands that are collectively responsible for the maintenance of base flows; the attenuation of flood; the production of organic material that fuels downstream food webs; and the trapping or removal of sediments, nutrients and contaminants that would otherwise contribute to the degradation of the physical, chemical, or biological integrity of downgradient waters. Although individually these wetlands may have minimal connections to downstream waters, the cumulative impact of these diffuse connections is tremendously important to the maintenance of downstream biota and ecosystem integrity. Historically, the destruction of wetlands has caused serious declines in the water quality of downstream waters and has had a substantial effect on flood regimes. The EPA report should describe the rich literature on historic wetland loss and the resulting consequences for the water quality, biodiversity, and flood impacts on downstream waters. This literature should be provided as a preface to a discussion of the need to consider the aggregate or cumulative impacts of wetlands that may each individually have minimal hydrologic, chemical or biological connections to downstream waters.

Assessment of the degree of wetland connectivity is best conducted on aggregated wetland complexes rather than on individual wetlands because over a range of precipitation regimes the boundaries of any single wetland may vary through space and time (e.g., Drexler et al. 2013). The regional context (e.g., geology, climate, landforms, and surficial sediments) is a major driver of the temporal and spatial scales of hydrologic linkages. Thus, regional context and spatial landscape position and scale should also be considered when evaluating the degree of connectivity, e.g., distance from and size of wetlands (or similar wetland types). The SAB notes that various frameworks for regionalization exist (e.g., Hydrologic Landscape Regions) and include characterizations of landscapes at nested scales, such as regional, sub-regional, and local. These nested scales can be used to summarize variability in connectivity identified in the peer-reviewed literature.

Recommendations

- The Report should be articulate and justify the importance of assessing wetland connectivity in terms of aggregated wetland complexes, rather than individual wetlands.
- The Report should discuss the usefulness of regionalization methods to summarize information about wetland connectivity at nested scales.
- The Report should analyze the scientific literature to determine if there is an appropriate scaling that should be used for determining how non-floodplain wetlands may be aggregated when considering their effects on downstream waters. A discussion on the how the scaling may vary geographically and based on factors affecting connectivity should be included.

1
2 **3.7.6. Discussion of Human Alteration of Landscapes in Section 5.4 of the Report**
3

4 The Report tends to focus on natural wetland systems or those with minimal disturbance. As previously
5 discussed, human disturbances (and related legacy effects) alter the type, strength and magnitude of
6 connectivity pathways. Some types of disturbances promote connections where none previously existed;
7 others alter existing types of connections or trigger the transport of novel chemical or biological species.
8 Creating connections where none previously existed, or where they were of low frequency through time,
9 can affect the biological integrity of downstream waters. For example, such connections can be a key
10 problem for amphibians that must breed and rear in wetlands free of fish (i.e., vernal pools). There is a
11 large literature on the importance and conservation of ephemeral habitats for amphibians and other
12 species and functions (Calhoun and deMaynadier 2008; Semlitsch 1998, 2000, 2002; Semlitsch and
13 Bodie 2003). Most of these references are from the eastern U.S. There is a suite of species, mostly toads
14 that rely on ephemeral aquatic habitats in the west and Great Plains region, but they are less well known.
15 In addition, there are many instances where man-made isolated wetlands occur within the landscape.
16 These features are often found behind levees or within isolated parcels within urban landscapes and do
17 not provide the same ecosystem functions as natural wetlands. The SAB recommends that Section 5.4,
18 as well as other sections of the Report acknowledge these types of alterations or man-made habitats and
19 include a discussion of current and past (legacy) human alterations of watersheds and how they affect
20 the type, strength, and magnitude of connectivity pathways. In particular, human activities such as water
21 diversion or water extraction may influence the water table, thereby reducing the potential for
22 connections within and among wetlands and downstream waters. Extractive activities or those that alter
23 hydrologic flow paths (diking, channelization, damming) may influence the magnitude of natural
24 disturbances such as floods or droughts, and subsequently affect the integrity of downstream waters.

25
26 *Recommendation*
27

- 28 • Section 5.4, and other sections of the Report, should be revised to discuss the legacy effects of
29 human activities and their effect on the type, strength, and magnitude of connectivity pathways.
30

31 **3.8. Non-floodplain Waters and Wetlands: Review of the Findings and Conclusions**
32

33 *Charge Question 5(b). Conclusion (3) in section 1.4.3 of the Report Executive Summary discusses*
34 *major findings and conclusions from the literature referenced in Charge Question 5(a) above. Please*
35 *comment on whether the conclusions and findings in section 1.4.3 are supported by the available*
36 *science. Please suggest alternative wording for any conclusions and findings that are not fully*
37 *supported.*
38

39 In responding to EPA’s findings and conclusions regarding connectivity among open waters and
40 “unidirectional” non-floodplain wetlands and downstream waters (Section 1.4.3 of the Report), the SAB
41 focused on knowledge drawn from the peer-reviewed literature, especially that: (1) connectivity extends
42 beyond hydrologic connectivity, (2) each connectivity flowpath can be described as a gradient that
43 varies over space and time, and (3) multiple low magnitude connections can have large aggregate effects
44 on integrity of downstream waters.
45
46
47

3.8.1. Scientific Support for the Conclusions Concerning Non-floodplain Waters and Wetlands

The SAB disagrees with the overall conclusion in Section 1.4.3 of the Report (Conclusion 3) indicating that, “The literature we reviewed does not provide sufficient information to evaluate or generalize about the degree of connectivity (absolute or relative) or the downstream effects of wetlands in “unidirectional” landscape settings.” This statement is inconsistent with the text immediately preceding it, which describes numerous scientifically-established functions of non-floodplain wetlands that can benefit the physical, chemical, and biological integrity of downstream waters. Furthermore, the conclusion largely overlooks the effects of deep aquifer connections and non-hydrologic biological connections on downstream waters. The SAB finds that the scientific literature provides ample information to support a more definitive statement, and strongly recommends that the authors revise this conclusion to focus on what is supported by the scientific literature and articulate the specific gaps in our knowledge that must be resolved (e.g., degree of connectivity, analyses of temporal or spatial variability).

The SAB recommends that Conclusion 3 in the Report explicitly recognize that the connectivity of non-floodplain waters to downstream ecosystems varies widely. Because of this the connectivity of non-floodplain waters should be evaluated along a gradient rather than as a dichotomous, categorical variable.

The SAB recommends that all of the Report’s conclusions encompass connections beyond hydrologic ones, and that the frequency, magnitude, and duration of these connections be considered as well as their predictability. The SAB recommends that within the text of Conclusion 3 in the Report, the authors explicitly state the four pathways by which non-floodplain wetlands can be connected to downstream waters: via surface water, shallow subsurface or ground water flowpaths, or through the movement of biota. It is the magnitude and effect of material, water or biotic fluxes rather than the simple presence or absence of a flux that determines the strength of the connection between a wetland and downstream waters.

The SAB disagrees with the notion, implied within the Report, that even minimal hydrologic connections are more important than biological connections, no matter how large the flux. The SAB recommends that this emphasis shift in order to account for strong connections that affect any one of the five functions used to describe connectivity in the EPA Report. If the goal of defining and estimating connectivity is to protect downstream waters, the interpretation must move from a dichotomous, categorical distinction (connected vs. not connected) towards a gradient approach that recognizes variation in the strength, duration and magnitude and effect of those connections. The SAB recommends that an integrated systematic approach be taken to conceptualize the structure and function of non-floodplain wetlands. The systems approach, which evaluates connectivity at the landscape scale, is used by hydrogeologists, and by surface water and ground water hydrologists, who have the quantitative tools and conceptual models to determine the connectivity of both surface and subsurface hydrological systems to non-floodplain wetlands (ASTM, 1996; Kolm, et. al, 1996). Such an approach could be extended to include biological connections and HGM wetland classifications (Kolm et.al., 1998).

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1 *Recommendations*

- 2
- 3 • The overall conclusion for non-floodplain wetlands (Conclusion 3 in Section 1.4.3) should be
 - 4 revised to focus on what is supported by the scientific literature and to provide more specifics on
 - 5 data and research gaps (e.g., degree of connectivity, analyses of temporal or spatial variability).
 - 6
 - 7 • Conclusion 3 of the Report should explicitly discuss the four pathways by which non-riparian / non-
 - 8 floodplain wetlands can be connected to downstream waters: i.e., via surface water, shallow
 - 9 subsurface flowpaths, shallow or deep ground water flowpaths, or through the movement of biota.
 - 10
 - 11 • The conclusions in the Report should state that the determination of connectivity should be based on
 - 12 the magnitude, duration and frequency of water, material, and biotic fluxes to downstream waters,
 - 13 and their impact on the integrity of downstream waters.
 - 14

15

16 **3.8.2. Recommendations Concerning Findings for Waters and Wetlands in Non-floodplain**

17 **Settings**

18

19 The SAB provides a number of recommendations to improve the presentation of findings in Section

20 1.4.3 of the Report.

21

22 The SAB recommends that conclusions be stated as concise, declarative statements. To accomplish this,

23 the Report authors should remove references to specific studies within the text of the key findings. The

24 Report’s conclusions are intended to summarize general themes arising from a broad synthesis of

25 diverse literature. The SAB finds that it is not necessary to attribute these overarching findings to one or

26 a few specific studies.

27

28 The SAB also recommends that the key findings be more explicitly presented in the text of the Report.

29 Conclusions about non-floodplain wetlands are summarized in Table 5-4, but these same summary

30 points are not clearly explained in the text itself. In addition, Table 5-4 discusses functions of wetlands

31 but does not present conclusions on how those functions translate to an effect on the physical, chemical,

32 or biological integrity of downstream waters based on the magnitude or duration of any of the modes of

33 connection discussed in the literature. For example, the statement that “unidirectional wetlands can

34 remove, retain, and transform many nutrient inputs” refers to such functions, but there is no conclusion

35 about how these would affect downstream waters.

36

37 The SAB recommends that the EPA revise several of the key findings in Section 1.4.3 of the Report.

38 These revisions are consistent with the literature synthesis performed and the SAB’s knowledge of the

39 subject.

40

41 *Key Finding b*

42

43 The SAB recommends including the following statement in the Report as an additional key finding on

44 the *biological functions* of “unidirectional” wetlands.

45

46 Suggested statement: *Wetlands provide unique and important habitats for many organisms, both*

47 *common and rare. Some of these organisms require multiple types of waters to complete their full life*

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1 *cycles, including downgradient waters. Other organisms, especially abundant and/or highly mobile*
2 *species, play important roles in transferring energy and materials between wetlands and downstream*
3 *waters.*

4
5 The SAB also notes that the Report's conclusion on the similarity between wetlands and other water
6 bodies needs further substantiation from the literature as the functions within each are quite different,
7 especially in nutrient and organic matter production. In addition, this conclusion should recognize the
8 differences between natural wetland systems and those that are man-made or are found in urban
9 environments.

10
11 *Key Finding c*

12
13 The SAB recommends including the following statement in the Report as an additional key finding
14 about non-floodplain wetlands and downgradient waters to parallel the preceding finding on "hydrologic
15 connectivity."

16
17 Suggested statement: *Biological connections are likely to occur between all non-floodplain wetlands*
18 *and downstream waters. Whether those connections are of sufficient magnitude to impact downstream*
19 *waters will either require estimation of the magnitude of material fluxes or evidence that these*
20 *movements of organisms are required for the survival and persistence of biota which contribute to the*
21 *integrity of downstream waters.*

22
23 *Key Finding f*

24
25 The SAB recommends including the following two additional key findings that summarize important
26 information from the main body of the document that were not emphasized in the original wording of
27 the key finding f.

28
29 Suggested additional key finding on *spatial proximity* of non-floodplain wetlands: *Spatial proximity is*
30 *one important determinant of the magnitude, frequency and duration of connections between wetlands*
31 *and streams that will ultimately influence the fluxes of water, materials and biota between wetlands and*
32 *downstream waters.*

33
34 Suggested additional key finding on the *cumulative or aggregate impacts* of non-floodplain wetlands:
35 *The cumulative influence of many individual wetlands within watersheds can strongly affect the spatial*
36 *scale, magnitude, frequency, and duration of hydrologic, biologic and chemical fluxes or transfers of*
37 *water and materials to downstream waters. Because of their aggregated influence, any evaluation of*
38 *changes to individual wetlands should be considered in the context of past and predicted changes (e.g.,*
39 *from climate change) to other wetlands within the same watershed.*

40
41 The SAB recommends that the Report authors cite the following references in support of this last
42 statement: Preston and Bedford (1988); Lee and Gosselink (1988).

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1 *Recommendations*

2

3 • The authors should remove references to specific studies within the text of the key findings in the
4 Report. The Report’s conclusions are intended to summarize general themes arising from a broad
5 synthesis of diverse literature.

6

7 • The key findings should be more explicitly presented in the text of the Report. Conclusions about
8 “unidirectional” wetlands are summarized in Table 5-4, but these same summary points are not
9 clearly explained in the text itself.

10

11 • The SAB recommends revising several of the key findings in Section 1.4.3 of the Report (see
12 suggested text above).

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1
2 **APPENDIX A: THE EPA’S CHARGE QUESTIONS**

3
4 **Connectivity of Streams and Wetlands to Downstream Waters:**
5 **A Review and Synthesis of the Scientific Evidence**

6
7 **Technical Charge to External Peer Reviewers**

8
9
10 Understanding the physical, chemical, and biological connections by which streams, wetlands,
11 and open-waters affect downstream waters such as rivers, lakes, and oceans is central to
12 successful watershed management and to meeting water quality goals. It is also central to
13 informing policy decisions that guide our efforts to meet these goals. The purpose of this Report,
14 titled *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of*
15 *the Scientific Evidence* is to summarize the current scientific understanding of broadly applicable
16 ecological relationships that affect the condition or function of downstream aquatic ecosystems.
17 The focus of the Report is on small or temporary non-tidal streams, wetlands, and open-waters.
18 Examples of relevant connections include transport of physical materials such as water or wood,
19 chemical compounds such as nutrients or pesticides, movement of biological organisms such as
20 fish or insects, and processes or interactions that alter material transport, such as nutrient
21 spiraling. Materials reviewed in this Report are limited to peer reviewed scientific literature.
22 Findings from this Report will help inform EPA and the U.S. Army Corps of Engineers in their
23 continuing policy work and efforts to clarify what waters are covered by the Clean Water Act. As
24 a scientific review, the Report does not consider or make judgments regarding legal standards for
25 Clean Water Act jurisdiction.

26
27 The Report is presented in six chapters. Key findings and major conclusions are summarized in
28 Chapters 1 (Executive Summary) and 6 (Conclusions and Discussion). Chapter 2 (Introduction)
29 describes the purpose and scope of the document and the literature review approach. Chapter 3
30 presents a conceptual framework that describes the hydrologic elements of a watershed, the types
31 of physical, chemical, and biological connections that link them, and watershed climatic factors
32 that influence connectivity at various temporal and spatial scales. Chapter 4 surveys the literature
33 on stream networks with respect to physical, chemical, and biological connections between
34 upstream and downstream habitats. Chapter 5 reviews the literature on connectivity and effects
35 of non-tidal wetlands and certain open waters on downstream waters. All terms are used in
36 accordance with standard scientific meanings, and definitions which are in the Report glossary.
37
38

TECHNICAL CHARGE QUESTIONS

Overall Clarity and Technical Accuracy of the Draft Report

1. Please provide your overall impressions of the clarity and technical accuracy of the draft EPA Report, *Connectivity of Streams and Wetlands to Downstream Waters: A Review and Synthesis of the Scientific Evidence*.

Conceptual Framework: An Integrated, Systems Perspective of Watershed Structure and Function

2. Chapter 3 of the draft Report presents the conceptual basis for describing the hydrologic elements of a watershed; the types of physical, chemical, and biological connections that link these elements, and watershed climatic factors that influence connectivity at various temporal and spatial scales (e.g., see Figure 3-1 and Table 3-1). Please comment on the clarity and technical accuracy of this chapter and its usefulness in providing context for interpreting the evidence about individual watershed components presented in the Report.

Lotic Systems: Ephemeral, Intermittent, and Perennial Streams

- 3(a) Chapter 4 of the Report reviews the literature on the *directional (downstream) connectivity and effects* of ephemeral, intermittent, and perennial streams (including flow-through wetlands). Please comment on whether the Report includes the most relevant published peer reviewed literature with respect to these types of streams. Please also comment on whether the literature has been correctly summarized. Please identify any published peer reviewed studies that should be added to the Report, any cited literature that is not relevant to the review objectives of the Report, and any corrections that may be needed in the characterization of the literature.
- 3(b) Conclusion (1) in section 1.4.1 of the Report Executive Summary discusses major findings and conclusions from the literature referenced in Charge Question 3(a) above. Please comment on whether the conclusions and findings in section 1.4.1 are supported by the available science. Please suggest alternative wording for any conclusions and findings that are not fully supported.

Lentic Systems: Wetlands and Open Waters with the Potential for Non-tidal, “Bidirectional” Hydrologic Flows with Rivers and Lakes

- 4(a) Section 5.3 of the Report reviews the literature on the *directional (downstream) connectivity and effects* of wetlands and certain open waters subject to non-tidal, “bidirectional” hydrologic flows with rivers and lakes. Please comment on whether the Report includes the most relevant published peer reviewed literature with respect to these types of wetlands and open waters. Please also comment on whether the literature has been correctly summarized. Please identify any published peer reviewed studies that should be added to the Report, any cited literature that is not relevant to the review

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1 objectives of the Report, and any corrections that may be needed in the characterization
2 of the literature.

3
4 4(b) Conclusion (2) in section 1.4.2 of the Report Executive Summary discusses major
5 findings and conclusions from the literature referenced in Charge Question 4(a) above.
6 Please comment on whether the conclusions and findings in section 1.4.2 are supported
7 by the available science. Please suggest alternative wording for any conclusions and
8 findings that are not fully supported.

9
10 **Lentic systems: Wetlands and Open Waters with Potential for “Unidirectional” Hydrologic**
11 **Flows to Rivers and Lakes, Including “Geographically Isolated Wetlands”**

12
13 5(a) Section 5.4 of the draft Report reviews the literature on the *directional (downstream)*
14 *connectivity and effects* of wetlands and certain open waters, including “geographically
15 isolated wetlands,” with potential for “unidirectional” hydrologic flows to rivers and
16 lakes. Please comment on whether the Report includes the most relevant published peer
17 reviewed literature with respect to these types of wetlands and open waters. Please also
18 comment on whether the literature has been correctly summarized. Please identify any
19 published peer reviewed studies that should be added to the Report, any cited literature
20 that is not relevant to the review objectives of the Report, and any corrections that may be
21 needed in the characterization of the literature.

22
23 5(b) Conclusion (3) in section 1.4.3 of the Report Executive Summary discusses major
24 findings and conclusions from the literature referenced in Charge Question 5(a) above.
25 Please comment on whether the conclusions and findings in section 1.4.3 are supported
26 by the available science. Please suggest alternative wording for any conclusions and
27 findings that are not fully supported.

APPENDIX B: ADDITIONAL LITERATURE CITATIONS REGARDING BIOLOGICAL CONNECTIVITY

The following additional literature citations addressing biological connectivity are provided for the EPA's consideration in developing the Report. These papers represent combinations of floodplain-stream, wetland-stream, and wetland-wetland interactions, but in many cases provide evidence of connectivity among multiple aquatic habitats. The citations are organized by major taxonomic groups and in some cases by topics.

General

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Birds

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- 18 **Fish**
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Science Advisory Board (SAB) Draft Report (6/5/14) to Assist Meeting Deliberations - Do not Cite or Quote

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