



American Fisheries Society

Organized in 1870 to Promote the Conservation, Development and Wise Utilization of Fisheries

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January 10, 2020

Dr. Thomas Armitage
Designated Federal Officer
Science Advisory Board
U.S. Environmental Protection Agency

Via Email: armitage.thomas@epa.gov

Dear Dr. Armitage:

On behalf of the American Fisheries Society and the science societies with whom we have jointly commented on the Environmental Protection Agency's and the Army Corps of Engineers' proposed Waters of the U.S. rule (Proposed Rule), I respectfully submit the attached information.

The definition of Waters of the U.S. in the 2015 Clean Water Rule was overwhelmingly supported by peer-reviewed science. The Proposed Rule is not based on sound science or the best-available peer-reviewed information and will remove or decrease protection for our nation's waters, including millions of miles of streams and millions of acres of wetlands that are critical for sustaining water quality and healthy watersheds.

The Proposed Rule seeks to exclude numerous waters and wetlands that directly affect the chemical, physical, and biological integrity of primary waters. The loss of protections for our nation's waters called for in the proposed Rule would have far-reaching implications for fish, wildlife, and their habitats, as well as causing economic impacts by harming recreational and commercial fisheries and reducing water quality.

Attached please find the comment letters submitted to EPA and the Army Corps of Engineers during the recent rulemaking to redefine Waters of the U.S. In addition, attached is a publication developed by the American Fisheries Society that catalogues the impacts to fish and fisheries as a result of the loss of protections for waters under the Proposed Rule, entitled "Headwater streams and wetlands are critical for sustaining fish, fisheries, and ecosystem services."ⁱ

Please feel free to contact me if the members have any questions or would like to discuss this information further.

Thank you for your consideration.

Sincerely,

Drue Banta Winters
Policy Director

ⁱ Colvin, S. A. R., S. M. P. Sullivan, P. D. Shirey, R. W. Colvin, K. O. Winemiller, R. M. Hughes, K. D. Fausch, D. M. Infante, J. D. Olden, K. R. Bestgen, R. J. Danehy, and L. Eby. 2019. Headwater streams and wetlands are critical for sustaining fish, fisheries, and ecosystem services. *Fisheries* **44**:74-91.