



March 6, 2017

Administrator Scott Pruitt
Office of the Administrator 1101A
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Endorsement of *Amici Curiae* Brief of Wetland and Water Scientists in Support of the Clean Water Rule

Dear Administrator Pruitt:

The Society of Wetland Scientists (SWS), American Fisheries Society (AFS), American Institute of Biological Sciences (AIBS), Ecological Society of America (ESA), Phycological Society of America (PSA), Society for Ecological Restoration (SER), and Society for Freshwater Science (SFS) support the sustainable management of the nation's waters. We are science-based organizations with diverse areas of expertise in the ecological and biological sciences. Our collective 200,000+ members and 130+ professional societies and research organizations work in the private sector, academia, and various tribal, state and federal agencies. As non-profit organizations, we support and foster sound science, education, restoration and management of wetlands and other aquatic resources. Thus, we track policies and actions that affect these aquatic resources and we promote science-based policy-making.

The United States Court of Appeals for the Sixth Circuit is reviewing the U.S. Environmental Protection Agency and the U.S. Army Corps of Engineers' Clean Water Rule, which defines the geographic coverage of the Clean Water Act. Recently, wetland and aquatic scientists filed an *amici curiae* brief with the court in support of the Clean Water Rule. The organizations that have signed this letter agree with the brief and its use of sound science to explain the urgent need for the Clean Water Rule.

The Clean Water Rule was developed using the best available science, technical experts, and >1,000 peer-reviewed scientific studies. The *amici curiae* brief describes how wetlands, streams, and adjacent waters significantly affect the chemical, physical, and biological integrity of traditional navigable waters, interstate waters, and the territorial seas. However, President Trump's February 28th, 2017 Executive Order pertaining to WOTUS would undermine the Rule and deprive American citizens of the clean water benefits derived from the Rule. We encourage you to review the scientists' *amici curiae* brief and to defend the Clean Water Rule instead. The *amici curiae* brief is available at:
<http://stetson.edu/law/amicicuriae>

Wetlands provide many services that promote human well-being including economic and non-economic benefits. Foremost, they keep our streams, lakes, and groundwater cleaner by 'treating' urban and agricultural runoff; this treatment includes reducing the negative effects of pollutants, transforming harmful nitrates into harmless nitrogen gas, trapping sediment, and removing pathogens. They store water, and thus are a source of water during times of drought. Many

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wetlands soak up runoff and floodwaters, which reduces peak flood-flows and avoids costly flood damage. Lastly, wetlands sustain essential habitat for wildlife, fish, and waterbirds to feed, nest, breed, spawn, and rear their young in ‘productive nurseries.’

The nation’s wetlands cover a tiny proportion of our landscapes (<6% of the lower 48 states), yet they contribute many times their ‘fair’ or proportional share in services to human well-being—often more than 10 times as much as predicted from their area.* Like diamonds, they can be small, but extremely valuable.

Current science overwhelmingly supports the Clean Water Rule, as detailed in the scientists’ *amici curiae* brief. All people depend on the nation’s waters, and so we urge you to support the Clean Water Rule, which is needed for us to achieve the Clean Water Act’s objective to restore and maintain the chemical, physical, and biological integrity of the nation’s waters.

Respectfully,

Gillian T. Davies
President, Society of Wetland Scientists

Timothy A. Nelson
President, Psychological Society of America

Joe Margraf
President, American Fisheries Society

Bethanie Walder
Executive Director, Society for Ecological Restoration

Robert Gropp
Co-Executive Director, American Institute of Biological Sciences

Emily Bernhardt
President, Society for Freshwater Science

David M. Lodge
President, Ecological Society of America

* Calculation is based on data in Costanza R, et al. 1997. The value of the world’s ecosystem services and natural capital. *Nature* 387:253–260. This was reinforced by a recent update in Costanza R, et al. 2014. Changes in the global value of ecosystem services. *Global Environmental Change* 26:152–158. For more information, see Zedler, JB, Kercher, S. 2005. Wetland resources: Status, trends, ecosystem services, and restorability. *Annual Review of Environment and Resources* 30:39–74.