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SOCIETY of WETLAND SCIENTISTS

*“an international organization dedicated to the conservation, management
and scientific understanding of the world’s wetland resources”*

5 May 2008

Stephen L. Johnson
Administrator
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Mr. Johnson,

This letter pertains to EPA’s *Proposed Determination To Prohibit, Restrict, Or Deny The Specification, Or The Use For Specification, Of An Area As A Disposal Site; Yazoo River Basin, Issaquena County, MS* (Docket ID No. EPA-R04-OW-2008-0179). I am submitting the letter on behalf of the Society of Wetland Scientists (SWS), of which I am the President. SWS is a scientific society of more than 3,500 members that strives to promote scientific understanding, scientifically based management, and sustainable use of wetlands. It is well established that wetlands are intimately connected to waterways and have a large influence on water quality. They are habitat for fish and wildlife, and they protect upland areas from flood damage. SWS members have considerable research and management experience that bear on the question of whether to allow hydrologic control structures to be built in the Yazoo River Basin, Mississippi. It is our opinion, as approved by eligible members of the SWS Executive Board, that the EPA determination against the operation of such structures ensures that services provided presently by Yazoo River Basin wetlands will continue in the future.

The nation lost 82,500 acres of vegetated freshwater wetlands annually from 1998-2004 (Dahl 2006). Using figures provided by the U.S. Army Corps of Engineers (USACE), the proposed pumping station at Steele Bayou will cause an additional loss of 26,300 acres of jurisdictional wetlands, an amount equivalent to a 32% increase in the annual wetland loss rate. Another 40,700 wetland acres will experience changes in the natural timing, frequency, and duration of flood events. An EPA review of the project in 2000 placed the area of damaged or degraded wetlands at about 200,000 acres, or the equivalent of two years of current vegetated wetland losses. The extent of the proposed Yazoo River Basin wetland impacts is large even at a national scale, but they are particularly significant within the Mississippi River basin itself where 80% of floodplain wetlands have already been lost.

The USACE has proposed a mitigation plan to offset wetland losses from the project. Mitigation is still far from an exact science and many mitigation projects fail. One approach to dealing with the high failure rate is to require the creation or mitigation of more acres than was lost, often at a ratio of mitigated to lost wetlands of 1.5. It is not clear whether the USACE will be able to reach

this ratio, especially if the impacted acres approach the 200,000 acre estimate from the EPA. The limited scope of the USACE mitigation plan relative to the potential wetland area that will be impacted, combined with the ever-present challenge of ensuring mitigation success, strongly argues for avoiding the wetland impacts altogether.

Decades of scientific research by SWS members and others has made it clear that protecting the quality of US waters requires an integrated landscape management approach that considers the numerous navigable and non-navigable manifestations of water and their interconnections. It is likely that losing wetlands and decreasing the frequency of flood events in the Yazoo River Basin will compromise the ability of these systems to remove nutrient pollutants. In fact, overall nutrient pollution is likely to increase as drainage allows new agricultural areas to be brought into fertilizer-dependent crop production.

Many SWS members were among the 541 wetland scientists and managers who signed a three page letter urging the EPA to seriously consider the negative impacts of the proposed project on Yazoo Basin wetlands. The EPA's determination that the project should not be permitted reflects the depth and weight of their concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Patrick Megonigal', written in a cursive style.

J. Patrick Megonigal, Ph.D.
President, Society of Wetland Scientists

Cited Report:

Dahl, T.E. 2006. Status and trends of wetlands in the conterminous United States 1998 to 2004. U.S. Department of the Interior; Fish and Wildlife Service, Washington, D.C. 112 pp.