



Ecological Society of America
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Washington, DC 20036

March 29, 2010

Ms. Nancy Sutley
Chair, Council on Environmental Quality
730 Jackson Place, NW
Washington, DC 20503

On behalf of the Ecological Society of America (ESA), I appreciate the opportunity to provide feedback on the Administration's proposed revisions to federal water resources planning guidelines (P & G). Sustaining freshwater ecosystems and resources is a major focus of ESA and its 10,000 members, many of whom are scientific experts in aquatic and wetland ecology.

Freshwater is vital to life and to the nation's economic well-being. We know that freshwater ecosystems provide ecosystem services including flood control, recreation, purification of wastes, and production of fish and other marketable goods. Unfortunately, U.S. freshwaters are increasingly degraded by development, dams, extractive uses, exotic species introductions and native extinctions, and pollution. Slowing or, ideally, reversing this trend will require policy that makes restoration and maintenance of freshwater ecosystems a top priority.

We are pleased to see that the proposed P & G would require federal agencies to account for ecosystem services: "The concept of ecosystem services provides an approach to evaluating the ways in which ecological systems, and changes to those systems induced by human actions, affect human well-being. Ecosystems, however, can also be valued not only for the services they provide to humans directly or indirectly, but for other reasons, including intrinsic natural values such as biodiversity."

ESA also applauds the inclusion of watershed and ecosystem based approaches. Water flows across jurisdictional boundaries, so it is important that we understand and manage freshwater resources at the scale of the broader landscape.

We do have several concerns, however. Your stated intent: to "protect and restore natural ecosystems and the environment while encouraging sustainable economic development" could result in the continued degradation of the nation's freshwater ecosystems if it is read to imply that in certain cases short-term economic development would still take priority over long-term sustainability. Water delivery systems and other development projects are engineered with life spans and management guidelines of decades to, at most, a century. In contrast, freshwater ecosystems and the aquifers and watersheds that support them have evolved over many millennia and their sustainability must be considered from a long-term perspective. We have left behind the era in which we can divert more water for economic development without carefully

considering whether we are tapping or over-tapping supplies needed to sustain resilient social-ecological systems over the long term.

We are also concerned that the guidelines do not sufficiently address the increased stress of the combined effects of human activities and climate change on water resources. Existing challenges, including declining water quality, soil salinization, shrinking wildlife migration corridors, and decreasing fisheries, will likely grow more severe. Proactive steps should be taken, including protecting and restoring river corridors and securing sufficient flows (magnitudes and timings) to maintain vital functions in fresh water ecosystems.

Given the importance of clean and abundant water to human welfare and the growing strain that demands and climate change are placing on this already-degraded resource, the time is right to place restoration and maintenance of the nation's water bodies as a top priority in U.S. water planning.

We hope that the Administration will give ESA's comments serious consideration. If the Society and its many water experts may be of service, please do not hesitate to contact us via ESA's Public Affairs Director, Nadine Lymn, at 202-833-8773, ext. 205 or Nadine@esa.org.

Sincerely,

A handwritten signature in cursive script that reads "Mary E. Power".

Mary E. Power
President