

The Honorable Tom Vilsack
Secretary, U.S. Department of Agriculture
1400 Independence Avenue
Washington, DC 20250

May 15, 2014

Dear Secretary Vilsack,

The undersigned conservation and scientific organizations write to strongly encourage the US Department of Agriculture to incorporate early growing season imagery into the wetlands determination process. Our organizations share the concern that wetland determinations that do not utilize early growing season imagery and other current scientific technologies may fail to accurately identify temporary and seasonal wetlands.

The Prairie Pothole Region (PPR) has become widely recognized as an imperiled landscape deserving its status as a national conservation priority region. Both Congress and the Obama administration have rightly prioritized the conservation of the PPR through a variety of funding streams and policy priorities. However, the current wetland determination process, which does not consistently utilize early growing season imagery, may well be exacerbating the problem of wetlands loss in the region.

The vast majority of wetlands in the Prairie Pothole Region are temporary or seasonal in nature. These wetlands are critical to the production of waterfowl, upland game birds, and the protection of water quality and flood attenuation. They comprise the very essence of why the PPR is a globally unique landscape. Aerial images obtained in mid- to late-summer fail to capture these temporary wetlands. In the US portion of the PPR, nine out of ten wetlands have seasonal or temporary hydrology according to the National Wetlands Inventory (NWI).

Early growing season imagery, used in continued combination with traditional late-summer FSA imagery, National Wetlands Inventory data, updated soils maps, LiDar data and physical site visits, will ensure that the wetland determination process is as accurate and technically robust as possible, serving farmers, our nation's natural resources, and the American public.

Our organizations are concerned that without a fundamental commitment from the Department at all levels to implementing an accurate and transparent wetland determination process across the country, we will continue to lose our most highly productive wetlands to conversion. In particular, our organizations are concerned that the Department's attempts to address the current backlog of wetlands determination requests do not unintentionally impact the efficacy of those determinations.

With the recent passage of the 2014 Farm Bill, Congress has clearly stated that wetlands conservation is a public policy priority across all USDA programs. Without the addition of early growing season imagery to the current wetlands determination process, our organizations believe that important wetlands will be omitted from the conservation framework, much to the detriment of downstream water quality,

flood control, and fish and wildlife habitat. We encourage USDA to begin the use of early growing season imagery as an initial step in the process of strengthening wetlands determinations.

Sincerely,

Association of Fish and Wildlife Agencies

Delta Waterfowl

Ducks Unlimited

Izaak Walton League of America

Pheasants Forever

Quail Forever

The Nature Conservancy

Theodore Roosevelt Conservation Partnership

The Wildlife Society

Cc: Deputy Secretary of Agriculture Krysta Harden

Cc: Under Secretary for Natural Resources and Environment Robert Bonnie

Cc: Natural Resources Conservation Service Chief Jason Weller