

U.S. Environmental Protection Agency FY 2023-2024 National Water Program Guidance: Association of State Wetland Managers, Inc. Comments



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The Association of State Wetland Managers, Inc., (“ASWM”) submitted October 1st comments to the United States Environmental Protection Agency (“EPA”) addressing:

FY 2023 – 2024 National Water Program Guidance (“NWPG”)

The October 1st letter is directed to EPA’s Deputy Assistant Administrator of the Office of Water, Benita Best-Wong.

ASWM describes its mission as building capacity for state and tribal members and fostering collaboration among the wetland community of practice by encouraging the application of sound science to wetland management and policy, promoting the protection and restoration of wetlands and related aquatic resources, and providing training and education for members and the general public.

ASWM notes its understanding that the NWPG is a key planning document used by EPA to set forth agency strategies and actions. It is also deemed a framework for how EPA works with the states, tribes and territories to protect and improve the quality of United States waters.

ASWM states that the recommendations it is providing were crafted with the following guiding principles:

1. States and tribes strongly desire to work in partnership with EPA through meaningful involvement.
2. EPA has a long and successful history of working together with states, tribes, and territories on environmental protection and management.
3. Wetlands and other natural infrastructure serve an important role in protecting the environment and human health.

Recommendations include:

- Performance measures
- ASWM strongly recommends adding performance measures for wetlands and associated aquatic resources
- ASWM supports metrics on nature-based solutions to address water quality and flooding challenges
- ASWM highly recommends direct consultation with S/T/T wetland programs to identify and develop appropriate measures and methods of tracking wetland performance.

- Suggested criteria in developing wetland and NBS performance measures:
- Do not create metrics that require additional data collection
- Measures should be based on outcomes—not outputs—and tied to an agency action with a strong causal link to the desired environmental benefit.
- Incorporate cultural goals and Traditional Ecological Knowledge in tribal guidance
- Program-Specific Guidance & EPA Priority Activity
- Rulemaking based on sound science, law, and equity.
- Waters of the United States (WOTUS)
- Clean Water Act §401
- Clean Water Act §404
- Prioritize mapping, monitoring and assessment of wetlands and related aquatic resources.
- Communicate and coordinate across programs and agencies.
- Provide leadership in environmental justice.
- Grant Priorities
- Wetland Program Development Grant (WPDG) funds remain critical.
- Implementation funds are greatly needed for state and tribe wetland protection programs.
- Emphasize climate and environmental justice aspects of wetland and aquatic resource protection.

A copy of the letter can be downloaded [here](#).