

November 9, 2007

Water Docket
Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Attention Water Docket ID No. EPA-HQ-OW-2007-0697

The New England Interstate Water Pollution Control Commission (NEIWPCC), on behalf of its members, the New England states and New York, respectfully submits the following comments on the *Federal Geographic Data Committee (FGDC) Wetland Mapping Standard*. These comments were developed using a workgroup process in order to ensure representation of NEIWPCC Compact Member states' views and opinions. NEIWPCC's role is to coordinate and assist the efforts of its seven member states to improve and maintain water quality.

Our member states deem it beneficial to have a consistent approach to mapping wetlands for interstate comparison purposes, so that they can be regulated and managed properly. Currently, this consistency is lacking and the states are concerned that the United States Fish and Wildlife Service (FWS), the entity responsible for mapping wetlands in the United States, does not have the resources necessary to update the National Wetlands Inventory (NWI) on a continual basis. We recognize the intent of developing the FGDC Wetland Mapping Standard is to 1) streamline mapping efforts for greater consistency and efficiency as mapping technology has shifted from paper-based map products to technology-based mapping products, 2) facilitate consistent mapping layers that can be used across geopolitical and watershed boundaries; and 3) assure long-term usability of the data and minimize the need for revisions and updates over time. The development of this standard will help alleviate inconsistencies and will improve data management and mapping capabilities.

At the March 2006 New England Biological Assessment of Wetlands Workgroup (NEBAWWG) meeting, the states requested of us, an in-depth analysis of wetland mapping efforts in the region. NEIWPCC assessed the extent and quality of wetland data available in the region and issued a final report in August 2006. That report detailed how available digital data is highly variable and inconsistent from state to state and concluded that a concerted effort to increase the compatibility of data through a minimum mapping standard would greatly benefit the New England states and New York for interstate comparison purposes. With this in mind, the collective and individual needs of the states are of particular concern to the Commission, and we appreciate the opportunity to make the following points about the FGDC Wetland Mapping Standard.



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Funding

We recognize that this standard will be tied to certain federally funded wetland mapping projects. The FGDC Wetland Subcommittee encourages the use of the standard for those projects that would not necessarily receive federal funding in an effort to incorporate that data into the NWI. We are concerned that certain entities might not have the resources to use the mapping standard without federal funding support. While the standard suggests that these entities seek out grant funds to implement the mapping standard, there is not a specific source of funding noted to take this action. If the National Spatial Data Infrastructure (NSDI) will not incorporate any non-compliant data from any source except from NWI maps created before the implementation of the mapping standard, the Wetland Mapping Standard Workgroup should strongly consider creating a designated grant fund through a multiple federal agency partnership. For example, if grant funding were available, the first year of the standard implementation could aid those entities that wish to contribute to the NWI maps, but do not have the resources to meet the aggressive requirements of the proposed mapping standard.

Workgroup Recommendations to the FGDC

Appendix A of the FGDC Wetland Mapping Standard contains three recommendations for the FGDC to take into consideration for future and ongoing development of this wetland mapping standard:

- FGDC Riparian Standards,
- Marine Benthic Standards; and
- Proposed Future Tools for Unique Wetland Identifiers.

We support all three recommendations and would like the FGDC to place emphasis on the third recommendation: “Proposed Future Tools for Unique Identifiers and Tracking”. This recommendation is of particular importance because as technology evolves and more accurate data is used, it becomes more important to be able to track wetland feature lineage as the NWI maps grow and mature. Attributes that uniquely identify each mapped wetland feature enables users to “link back” to old data of a certain feature and track its changes temporally. This information can also be used in water quality and monitoring data sets to track changes in a watershed over time. Therefore, we think priority should be given to development and implementation of unique identifiers. The ability to track wetland changes and health is crucial to state environmental programs.

We recognize that the time and cost associated to applying these changes to the NWI maps would be significant. In order to incorporate these important changes and manage time and costs, we suggest that the FWS develop data versioning to present data history while developing the technology necessary to implement this change. FWS could use data versioning as they phase in the new technology to track lineage over a span of years. This change to the NWI, though significant, would be extremely beneficial to our member states, and to others who contribute wetlands data to the NWI.

Overall, the FGDC Wetland Mapping Standard is compatible with current state priorities. Our member states have identified a need for a minimum mapping standard and can benefit from this proposal. Depending on how the Geographic Information System (GIS) data system is set up in the implementation of the final standard, the states would appreciate the opportunity to comment further on aspects of usability. This initiative is important and we support the effort given, the standard will tie mapped wetland data with water data represented in the National Hydrography Dataset, so that wetlands can be understood in a global context through NSDI.

NEIWPCC greatly appreciates your consideration of our comments. We look forward to continuing conversations with the FGDC Wetland Subcommittee and Wetland Mapping Standard Workgroup on this document. If you have any questions, please do not hesitate to contact me or Kerry Strout of my staff at 978/323-7929.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Poltak", written in a cursive style.

Ronald F. Poltak
Executive Director

Cc: NEIWPCC Executive Committee and Commissioners
NEIWPCC Wetlands Workgroup
Matt Schweisberg, EPA Region 1
Margarete Heber, EPA HQ
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Susan Sullivan, Beth Card and Kerry Strout, NEIWPCC