



Backcountry Hunters & Anglers

*"The sportsmen's voice for our wild public lands, waters and wildlife"*

[www.backcountryhunters.org](http://www.backcountryhunters.org)

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27 September 2021

Subject: Comment on Ohio H. B. No. 175

Dear J. Kyle Koehler:

The Ohio Backcountry Hunters and Anglers is writing out of concern for the revisions proposed for Ohio Revised Code sections 3745.114 and 6111.01 – all proposed amendments are located within H.B. No. 175. H.B. 175 is currently in review of the Ohio House Agriculture and Conservation Committee. Given your leadership role in that committee, we wanted to reach out directly to you on this matter.

While we can appreciate *worthwhile* attempts to de-regulate senseless bureaucratic processes, removing protections to “ephemeral” waterways is a mistake. If one properly understands the nature of hydrology, giving priority to permanent water features but ignoring intermittent or ephemeral connections is short-sighted and doomed to failure. A basic grasp of the water cycle illustrates this clearly. Virtually all the water that pools in or flows through a permanent waterway originates upstream in ephemeral topography that funnels downstream to join progressively more water within the watershed. Upstream degradation, pollution, and alteration impacts downstream systems – always. Many stressors have minute effects, a few – catastrophic. One thing we know is this – dealing with issues (e.g., algal blooms) that manifest downstream is ineffective and ignores the root of the issue further up the watershed. Put another way, stripping ephemeral stream protections and only protecting permanent and semi-permanent waters promotes the foolish idea that we are willing to protect Ohio’s waterways from severe injury, but we are willing to stand by and let the system bleed out “by a thousand cuts.”

By transmittal of this letter, we – the Ohio Chapter of Backcountry Hunters & Anglers – are adopting a formal position of opposition to all proposed changes contained within H.B. 175. We implore you, on behalf of all Ohioans, to practice sound stewardship of Ohio’s water resources by retaining a broad definition of hydrologic features.

Please reach out with questions as we would like to engage further on this issue if that would be helpful.

Sincerely,

Ohio Chapter of Backcountry Hunters & Anglers  
Gabriel R. Karns  
Policy and Legislative Co-Chair