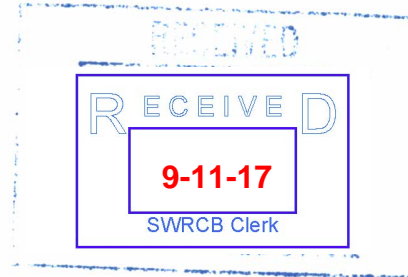


September 4, 2017

Felicia Marcus Chair and Board Members
State Water Resources Control Board
1001 I street
Sacramento, CA 95814



Dear Chair Marcus and Board members:

My name is Gail Prothero and I am writing today to express my support for the proposed statewide wetlands policy regulation (**“Procedures for Discharges of Dredged or Fill Materials to Waters of the State”**), and ask you and the other board members to do the same.

California has lost over 90% of its historic wetlands, and we must do all we can to stop further harm, protect what remains, and rebuild some of what we’ve lost.

Wetlands provide important habitat for many native species in this state, such as birds, fish, reptiles, and amphibians. Wetlands improve water quality by filtering water. They can also provide key protections from the rising ocean levels that climate change will bring.

The President has recently acted to roll back federal protections for wetlands. This is wholly unacceptable, and the state must do all it can to protect our resources from federal inaction. The State Water Resources Control Board stands in a unique position to lead in the face of federal retreat. I urge you to use your authority to adopt the statewide wetlands policy with the following changes to strengthen it.

1. Since usually mitigation wetlands don’t perform as well as natural wetlands and even when they work it often takes a decade or more before they really start to function as they should, and in order to comply with the State’s “no net loss” of wetland acreage or function policy, please insist that under the new **compensatory mitigation** policy every wetland acre destroyed or degraded must be mitigated by **at least** an acre of newly restored or created wetlands.
2. In the “Alternatives Analysis” section, the proposed policy states that every wetland-destroying project must submit an “Alternatives Analysis” showing why the project couldn’t be undertaken on a non-wetland site. But the policy then states that a Regional Water Board can ignore the Alternatives Analysis requirement for any project and it doesn’t even have to provide a reason. If that is the case, wetland destruction can continue as before. Please insist that an Alternatives Analysis must be preformed for every project.

With these changes, the **“Procedures”** will greatly enhance our chances to preserve our state’s remaining wetlands.

Sincerely,

Gail Prothero, 29302 Sandalwood Court, San Juan Capistrano, CA 92675