



September 10, 2017

Felicia Marcus Chair and Board Members State Water Resources Control Board
Jeanine Townsend, Clerk to the Board State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

VIA: Electronic mail to: commentletters@waterboards.ca.gov

RE: Support of the draft **“Procedures for Discharges of Dredged or Fill Materials to Waters of the State**

On behalf of the Board of Directors of the Environmental Center of San Diego thank you for the opportunity to comment on this critically important topic.

One of California’s most precious resources is its wetlands. Protection of our last-remaining wetlands is critical for the health of our waterways and wildlife. Wetlands improve water quality by filtering toxins, protect communities against flooding, and help to replenish groundwater supplies. They also provide essential habitat for millions of ducks, geese, songbirds and shorebirds that migrate along the Pacific Flyway each year, and support fish, snakes, and other animals. Over 85% of our sport and commercial fisheries and most of our migratory bird species are dependent upon wetlands. In California, wetlands support fifty-five percent of our endangered animal species

The US EPA is proposing to remove federal protections for these important waters. The State Water Resource Control Board (SWRCB) has the opportunity to adopt procedures that would protect these wetlands even without federal laws.

For many years the public has urged the State to adopt regulations to protect wetlands and in 2008 the State Water Resources Control Board (SWRCB) actually adopted a resolution telling staff to prepare such regulations. Nine years later we are still waiting. With an administration that has proven to be anti-environmental, now is the time for California to step up and complete these much needed protections.

Unfortunately for wetlands, most non-tidal wetlands are found on private property and thus are hard to protect. Non-tidal wetlands are those wetlands that are located in uplands as opposed to those wetlands, such as tidal marshes located in large bodies of water like oceans and lakes. Wetlands are also found most commonly in flat areas, often near rivers and streams

– places where people want to live or farm. California has lost about 90% of its historic wetlands and yet we still continue to see California’s wetlands destroyed at a rapid pace. Hundreds of acres of wetlands are lost every year.

The loss of wetlands can have catastrophic results as currently seen in Texas and Florida where development has covered key areas that were once critical to storm surge protection. In order for California to protect all remaining wetlands we suggest the following: 1) Alternative Analysis must be performed for every project, with no exceptions; 2) Every acre of wetland destroyed or degraded must be mitigated on a one to one ratio, meaning, at the very least, an acre of newly restored or created wetlands for every acre destroyed.

California can no longer count on the federal government for protection of our remaining wetlands. It is up to you, our State Water Resources Board, to make sure we have a critically thought out plan to save our remaining wetlands. You are in a unique position to do this and we urge you to go forward and adopt the statewide wetlands policy with our recommended changes.

Sincerely,

A handwritten signature in cursive script that reads "Pamela Heatherington".

Pamela Heatherington
Board Member Environmental Center of San Diego
contactecosd@gmail.com

