



July 13, 2016

Ms. Susan Fregien
Chief, Monitoring and Implementation Unit
Central Valley Regional Water Quality Control Board
11020 Sun Center Dr., #200
Rancho Cordova, CA 95670

Re: Proposed Resolution on Developing a Strategy for Regulation of Managed Wetlands - SUPPORT

Dear Ms. Fregien:

California Waterfowl Association is pleased to support proposed resolution to develop a strategy for managed wetlands and to revise the Tulare Lake Basin orders. Upon adoption of the proposed resolution, managed wetlands in the Tulare Lake Basin would no longer be required to participate in the Irrigated Lands Regulatory Program under the Tulare Lake Basin orders.

As you know, 95 percent of the historic wetlands in California no longer exist. Managed wetlands provide limited replacements for the vast wetlands that once supported millions of migrating waterfowl and other wetlands-dependent species. Although there are some water quality concerns related to some managed wetlands, for the most part managed wetlands do not raise the same water quality concerns as irrigated agriculture. Regulatory costs and requirements under the Irrigated Lands Regulatory Program can provide a disincentive for private landowners to continue to provide wetlands habitat. To the greatest extent possible, it is important that regulations affecting managed wetlands have real benefits to water quality and not be unduly burdensome to the ownership and operation of managed wetlands. The resolution recognizes this balance between environmental priorities.

Thank you for your leadership of the Managed Wetlands Workgroup. Your efforts are truly appreciated by the state and federal agencies, nonprofits, and private landowners who benefit from this process. We look forward to working with you and other Board staff in the development of a regulatory strategy that protects water quality without placing an undue burden on other environmental imperatives.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey A. Volberg". The signature is written in a cursive style and is positioned above the printed name.

Jeffrey A. Volberg
Director of Water Law & Policy