

Friends of the ESTUARY
PROTECTING • RESTORING • ENHANCING
THE SAN FRANCISCO BAY-DELTA ESTUARY

February 8, 2011

Jeannie Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

RE: COMMENT LETTER-CEQA-WETLAND AREA PROTECTION POLICY AND REGULATIONS

Dear Ms Townsend::

This letter is to convey the strong support of Friends of the San Francisco Estuary for the proposed Wetland Area Protection Policy and Dredge and Fill Regulations. We urge the Board to move forward with the environmental review process that is necessary to adopt this policy.

One of the purposes for which Friends of the Estuary was established was to support the Comprehensive Conservation and Management Plan (CCMP) originally adopted in 1993 and revised and approved by the San Francisco Estuary Partnership in 2007. The CCMP contains numerous actions and objectives to protect wetlands, many of which relate specifically to wetland regulation. The most relevant Actions are:

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WT 1.4 Identify and protect existing seasonal wetlands....

WT 2.1.1 Establish state wetland protection policies for the Estuary.

WT 2.1.2 Investigate State assumption of Section 404 of the Clean Water Act

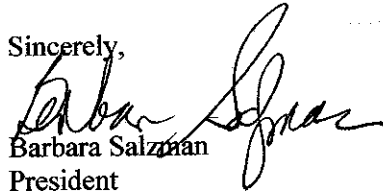
WT 2.4 Improve wetland protection provided under the Clean Water Act

As a result of California's Mediterranean climate many, of our wetlands do not sustain wetland vegetation and hydrology required by the federal definition. For this reason, many of California's important wetlands are not regulated under the federal definition. The Rapanos decision has decreased federal regulation even further, leaving the state's wetland resources subject to continued and exacerbated losses.

We recommend that the EIR include a "no net loss" policy in the Regulations and address it as well as wetland transition habitats, buffer areas adjacent to wetlands and functional connections between wetlands and related habitats (Action WT 1.3).

We urge the State Board to move speedily forward with the Draft Wetlands Protection Policy and Environmental Impact Report.

Sincerely,


Barbara Salzman
President