

3/18/08 Bd Mtg. Item 11
Wetlands & Riparian Areas
Deadline: 3/5/08 by 12 p.m.



March 4, 2008

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Sent via facsimile: 916-341-5621 and U.S. mail

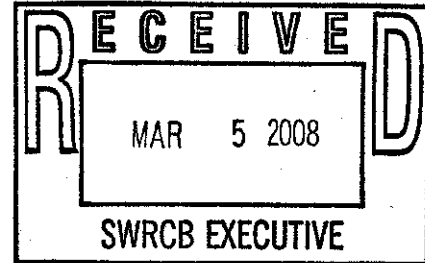
Comment Letter: SWRCB Resolution 2008 -
Resolution to Develop a Policy to Protect Wetlands and Riparian Areas
Board Meeting Session - Division of Water Quality - March 18, 2008

Dear Members of the State Water Resources Control Board:

This letter is submitted on behalf of the wetlands subcommittee of the Sierra Club Loma Prieta Chapter in support of the proposed Resolution that instructs SWRCB staff to develop a state Policy to Protect Wetlands and Riparian Areas.

As the proposed Resolution states, over 90 percent of historic wetlands and 85 percent of riparian acreage has been lost to development. California cannot afford to lose any more wetlands or riparian areas. Several years have already elapsed since the reduction of federal wetlands protection. We urge the State Water Board to vote Yes on the resolution with the following added provisions that would require more protection at a faster pace:

1. The State Water Board should instruct the staff to develop a policy that requires avoidance of wetland losses, with mitigation only allowed after all feasible avoidance alternatives have been exhausted.
2. In view of the immediate and continuing losses of wetlands and riparian habitat and to avoid any losses while studying Phase 2 and Phase 3, an interim Phase 1 goal should be established to protect both wetlands and riparian areas.
3. Similarly, an interim Phase 1 goal should protect against development, in addition to fill and dredge activities.
4. There should be specified timelines for developing Phase 2 and Phase 3.



5. The California definition of wetlands should include the entire suite of California wetlands - saltwater and brackish water marshes, estuaries, riparian habitat and floodplains, vernal pools, swales, and any area with hydrophitic plants and saturated soils.

California has always been a leader in taking the imitative in environmental matters. We greatly appreciate the Resolution's proposal to protect all waters of the state using a watershed approach.

Thank you for your consideration of our request.

Very truly yours,

Cynthia A. Denny (PW)

Cynthia A. Denny - Chair
On behalf of the Wetlands Subcommittee
Loma Prieta Chapter of the Sierra Club

CAD:pw

cc: Mondy Lariz, Chair of the Water Committee (LPSC)
Melissa Hippard, Director of the Loma Prieta Chapter