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To: commentletters
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Subject: Proposed Statewide Wetlands Policy Regulation, Comment Letter
Date: Wednesday, September 13, 2017 6:22:26 PM

To: Felicia Marcus, Chair, and Board Members
State Water Resources Control Board
c/o Jeanine Townsend, Clerk to the Board
From: Mary H. Clarke
Member, Sierra Club, San Diego Chapter
Subject: Proposed Statewide Wetlands Policy Regulation,
"Procedures for Discharges of Dredged or Fill Materials to Waters of the State"
Date: September 13, 2017



Dear Felicia Marcus, Chair, and Board Members:

I am writing to express my support for the proposed Statewide Wetlands Policy Regulation and urge the Board to support this regulation, with two changes, as stated below.

California has lost over 90 percent of its historic wetlands, and we need strong and clear regulations to prevent further harm, protect what remains, and restore what we have lost.

As you know, wetlands provide many essential benefits, including habitat for wildlife, especially endangered, threatened, and other sensitive species. Wetlands improve water quality by filtering water. They can also provide key protections from the rising ocean levels that climate change will bring.

Those of us in the environmental community are discouraged and extremely disappointed that the Trump administration has acted to roll back Federal protections for wetlands. Due to these regressive steps at the Federal level, we urge the State to all that it can to protect our wetlands.

I support the proposed regulation with two changes:

1. It is urgent that there be no further loss of wetlands. Therefore, under the new "compensatory mitigation policy," it should be made clear that every wetland acre destroyed or degraded must be mitigated by at least one acre of newly restored or created wetlands, to insure no net loss of wetlands.
2. An Alternatives Analysis should be required for every project that impacts wetlands. The proposed policy states that a Regional Water Board can ignore the Alternatives Analysis for any project without even providing a reason. To do so would allow wetlands destruction to continue as before. Please insure that an Alternatives Analysis is required for every project that impacts wetlands.

With these two changes, the proposed "Procedures" will greatly enhance our chances to preserve our State's wetlands.

The State Water Resources Control Board stands in a unique position to lead in the face of the Federal retreat to protect wetlands. I urge you to use your authority to adopt the proposed statewide wetlands policy regulation, with the two changes addressed above.

Thank you very much for your consideration of my comments.

Sincerely,

Mary H. Clarke
Member, Sierra Club, San Diego Chapter