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September 18, 2017

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov

Re: Comments on Preliminary Draft State Wetland Definition and Procedures for Discharges of Dredged or Fill Materials to Waters of the State


Dear Clerk and Members of the Board,

Grassland Water District and Grassland Resource Conservation District (“Grassland”) write to express support for the proposed State Wetland Definition and Procedures for Discharges of Dredged or Fill Materials (“Wetlands Policy”), *with the changes proposed by the Central Valley Joint Venture* (“CVJV”). Grassland is not a member of the CVJV, but collaborates closely with its members on matters related to wetland conservation and management.

We support the requested revisions to the Wetlands Policy submitted by the CVJV, which will strengthen protections for managed wetlands, including those in the Grasslands Ecological Area, the largest contiguous freshwater wetland complex west of the Rocky Mountains. In particular, the three changes requested by the CVJV will: (1) streamline the application process for Ecological Restoration and Enhancement Projects, in light of the strict definition of those projects and their importance for wetland conservation; (2) allow local agencies that have the primary function of managing wetlands to qualify as signatories to wetland enhancement, restoration, and establishment agreements; and (3) add language to the staff report or similar document, describing prior water board orders and resolutions that address managed wetlands.

Thank you for considering the requested revisions to the Wetlands Policy that were carefully developed by the CVJV. We encourage the Board and staff to incorporate the changes into the final version of the policy.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ricardo Ortega". The signature is fluid and cursive, with a large initial "R" and "O".

Ricardo Ortega, General Council
Grassland Water District and
Grassland Resource Conservation District