

Wetland/Riparian Policy
Deadline: 4/19/07 12 noon

From: Giberson <giberson@netgate.net>
To: <commentletters@waterboards.ca.gov>
Date: Wed, Apr 18, 2007 12:04 PM
Subject: Comment Letter - Wetland and Riparian Area Protection Policy

April 18, 2007

Honorable Members of the State Water Resources Control Board

RE: Comment Letter - Wetland and Riparian Area Protection Policy—
Maximum protection needed

Dear Board Members:

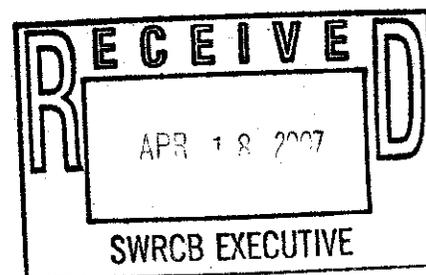
Given the loss of 85 to 98 percent of California's historic riparian areas and over 85 percent of our wetlands, we need the strongest regulations to protect our wetlands, riparian areas, and critical water quality.

With the quality of restored wetlands lower than native or naturally-occurring wetlands, even a "no net loss" policy cannot adequately address the significant historical loss of these crucial resource areas.

To protect, restore and advance the quality and quantity of our wetlands and riparian areas, the environmental information included in the environmental analysis should at a minimum address and correct the following:

- no statewide (Water Board) definition of wetlands;
- no statewide definition of riparian areas (thus making identification and protection efforts inconsistent — especially critical in view of an inadequate federal Clean Water Act riparian area definition);
- no consistent statewide definitions of beneficial uses of wetlands and riparian areas;
- lack of clarity in the existing regulatory framework for protecting wetlands and riparian areas (particularly serious in view of the recently-diminished protection under the federal CWA)
- need for efficient, effective, maximally-protective regulations to govern riparian areas and wetlands.

We strongly urge full consideration of the strongest possible protections at the analysis stage, and subsequent adoption of the most protective regulations.



Yours truly,

Alan and Meg Giberson