



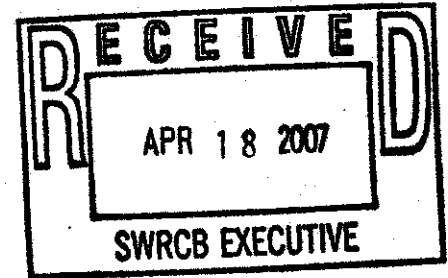
Cosumnes River Preserve  
13501 Franklin Blvd.  
Galt, CA 95632

tel (916) 683-2142  
fax (916) 683-1702  
nature.org

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

April 17, 2007

Song Her  
Executive Office  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-0100  
commentletters@waterboards.ca.gov



RE: Comment on Proposed Wetland and Riparian Area Protection Policy

Dear Ms. Her,

The Nature Conservancy (TNC) commends the Board for scoping alternatives for a Wetland and Riparian Area Protection Policy. California has lost over 95 percent of its wetlands and riparian habitat and has suffered ongoing erosion of ecosystem functions and services. The Board urgently needs to address this at a statewide level, especially given the reduced protection under the current federal Clean Water Act Section 404 program. The conservation benefits of a strong statewide policy for riparian and wetland habitats would be great.

We support Alternative 4, which is the only alternative that provides the necessary comprehensive and protective framework. However, the environmental analysis should consider potential unintended impacts of compensatory mitigation requirements on natural restoration projects, namely those designed specifically to enhance, restore, or increase the amount and function of wetland and riparian habitat. For example, it may be necessary to temporarily disturb or clear vegetation in the course of implementing a levee setback that would create and enhance riparian habitat. Depending on how impacts are assessed, however, the required compensatory mitigation could prove unduly onerous. The Board should consider each project's overall environmental benefits and scale the amount of mitigation appropriately. It is important to balance short-term impacts from implementing restoration against long-term benefits, while also putting in place safeguards that ensure poor-quality projects don't get mitigation credit if they don't meet functional performance requirements.

With this proposed new policy, the Board is taking a promising step forward to protect the some of California's most valuable, most heavily impacted, and most threatened natural resources. We encourage the Board to select Alternative 4, with appropriate mitigation requirements to promote rather than unduly hinder ecological restoration projects.

Sincerely,

Keith Whitener  
Project Director, Cosumnes and Delta Projects  
Cosumnes River Preserve  
The Nature Conservancy