



**Riparian Habitat Joint Venture**

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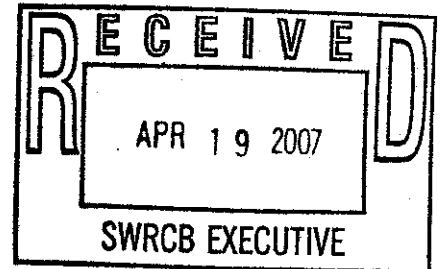
California Department of Fish &  
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U.S. Forest Service  
U.S. Geological Survey  
Wildlife Conservation Board

**Coordinator**

Ann Chrisney

Song Her  
Clerk to the Board  
Executive Office  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812

April 18, 2007



Dear Ms. Her,

The Riparian Habitat Joint Venture (RHJV) would like to commend the State Water Board for taking the lead in addressing the protection of riparian areas in California with a statewide policy. The 18 federal, state and non-profit partners of the RHJV have been working together since 1994 to restore, enhance and protect functioning riparian habitat across California.

Riparian areas provide one of the most biologically rich resources in California. They contribute ecosystem benefits for a multitude of wildlife and plant communities as well as for the human community in terms of aquatic health, water quality and flood safety. The RHJV would like to contribute the attached comments on the Wetland and Riparian Area Protection Policy Scoping Document produced by the State Water Board. The RHJV Coordinator attended the April 9, 2007 meeting in Sacramento and provided comments. The attached notes reflect the information provided at that meeting.

The RHJV looks forward offering our support to the State Water Board to help develop this statewide riparian and wetland protection policy that is so urgently needed to protect these critical resources. Thank you for your time.

Sincerely,

Ann Chrisney  
RHJV Coordinator

Attachment: RHJV comments on SWB informational document

**State Water Resources Control Board**  
**Proposed Wetland and Riparian Area Protection Policy**  
**CEQA Scoping Meeting**  
**April 9, 2007**

**RHJV Background**

The Riparian Habitat Joint Venture was initiated in 1994 in order to address the need for conserving riparian areas across California. Eighteen state, federal and non-profit conservation agencies and organizations signed an MOA agreeing to work together to restore, enhance and protect functioning riparian areas across California. The goals are to support the long term viability of land birds and other species and to ensure water quality, stream health and flood safety for California communities. We achieve this by developing technical information, providing project guidance, creating partnerships and informing policy. We are in the process of developing a statewide conservation strategy for conserving riparian areas which will include 1) a statewide inventory of current riparian areas, 2) quantitative riparian habitat objectives and 3) a scheme for prioritizing areas in the state to focus conservation efforts on.

The following goals in our RHJV Strategic Plan are relevant to the topic at hand:

- Raising the awareness of the critical importance of riparian areas not only to wildlife and plants but also of the many benefits and services it provides to human communities.
- The imperative to legally protect riparian areas with policies that recognize all of the functions of riparian areas outside of the definition of wetland systems (NRC 1995). There is a strong correlation in location and function of these two ecosystems that warrants consideration while planning and implementing conservation activities. NRC 2002 "there is a clear need for legal guidance at the federal, state and local levels that explicitly recognizes the importance of riparian areas and provides a legal framework for their protection, restoration and sustainability."

The focus of our comments is on riparian issues but we also support the same for wetland areas.

**SWB goal: provide clarity in the existing regulatory framework for protecting wetlands/riparian areas that are no longer regulated.**

The RHJV fully supports a policy to protect riparian areas which is urgently needed based on the fact that over 95% of riparian areas have been degraded or removed in California. Development of a riparian protection policy is included as a goal in our 2003 RHJV Strategic Plan. We strongly believe that this is important not only for riparian areas that are no longer regulated but also the majority of riparian areas that have never been protected because they did not meet the definition of wetlands in the first place.

**SWB goal: Provide statewide consistency in defining riparian areas to ensure protection of beneficial uses.**

The RHJV has been working since 2001 to develop a comprehensive inventory of existing and potential riparian habitat. This requires developing a standardized approach to defining as well as mapping them. This priority has been determined collectively by the RHJV partners and also appears in the Least Bell's Vireo Recovery Plan (USFWS 1998) and the California State Wildlife Action Plan (CDFG 2006).

The benefits of having an accurate measure of riparian areas in the state are 1) to accurately estimate watershed, bioregional and statewide habitat targets, 2) to help prioritize where to conduct conservation activities on the ground in order to maximize the benefit of these conservation activities using available funding, and 3) to measure our success in meeting riparian habitat conservation objectives.

The RHJV has conducted workshops, convened a technical committee, developed a mapping framework and conducted a pilot project to test the framework. The result is the RHJV report "Comparison of Methods to Map riparian Areas in California" (Collins et al. 2006). This report includes a comprehensive discussion of the multitude of definitions for riparian areas, their purposes and how they are applied as well as an RHJV riparian area mapping method that is currently being used to estimate riparian areas and is poised for mapping riparian areas for the entire state. The RHJV has adopted the NRC 2002 definition of riparian areas because we believe it most accurately describes the full form and function of riparian areas. We have applied this definition in our RHJV mapping methodology.

"Riparian areas are transitional between terrestrial and aquatic ecosystems and are distinguished by gradients in biophysical conditions, ecological processes, and biota. They are areas through which surface and subsurface hydrology connect waterbodies with their adjacent uplands. They include those portions of terrestrial ecosystems that significantly influence exchanges of energy and matter with aquatic ecosystems (i.e. a zone of influence). Riparian areas are adjacent to perennial, intermittent, and ephemeral streams, lakes, and estuarine-marine shorelines." (NRC 2002)

**SWB goal: providing statewide consistency in defining the beneficial uses of riparian functions and consistent statewide requirements for evaluating them in order to determine impacts and the necessary actions required to avoid, minimize and mitigate these impacts.**

The RHJV believes that accurately quantifying and qualifying riparian resources across California is urgently needed in order to develop an appropriate statewide conservation strategy to protect them. (Refer to discussion above regarding RHJV statewide inventory of riparian areas). This should include assessing riparian area mitigation values in relation to the current baseline of riparian resources across the state. Estimating the current extent of riparian across the state is the goal of the RHJV statewide inventory of riparian areas.

The RHJV supports SWB Alternative 4 as the most comprehensive and effective framework for developing a statewide riparian protection policy that will provide adequate protection for this critically valuable resource.

- Definitions that are fully protective of all the functions of WR systems
- Consistent definitions of beneficial uses statewide.
- Comprehensive framework for protecting WR areas from ALL impacts: including **pollutants, hydromodification, land and vegetation clearing and invasives.**
- State requirements that include the following for **all impacts not just dredge and fill:** cumulative effects, functional assessments, mitigation sequencing and requirements, performance standards, improving permitting coordination between agencies.

#### **Alternative 4 performance standards – establishing success criteria for functions of riparian mitigation projects**

The RHJV is working on completing a California riparian restoration handbook in 2007 which could prove valuable as a tool for assessing success of riparian restoration projects. This riparian restoration handbook will be based on the expertise of those who have been conserving riparian over the last 20 years. The intent is to provide practitioners, regulators, land managers, and planners with basic strategies and criteria to consider when planning and implementing riparian conservation projects. Among other things the handbook will include the fundamental criteria to consider for producing appropriate restoration on the ground and recommended approaches for different situations. One of the goals is to provide a tool for assessing restoration success.

**Alternative 4 - improving permitting coordination between agencies.** This aspect of the policy is urgently needed because there are a multitude of conflicting policies between agencies that have prevented valuable restoration efforts from being implemented.

**SWB goal: Policy will provide a statewide regulatory context for the Regional Water Boards to protect riparian areas**

Two of the most important concepts in the proposed SWB policy are 1) consistency and 2) statewide application. Riparian areas are by their nature transitional areas and they occur anywhere there is a waterbody. This makes them highly variable, so providing consistent statewide approaches to defining and protecting riparian areas is critical to developing an effective conservation strategy for protecting these areas. This is the foundation upon which the RHJV was conceived and we are looking forward to collaborating with the SWB on their proposed wetland and riparian protection policy.

Collins, J.N., M. Sutula, E.D. Stein, M. Odaya, E. Zhang, K. Larned. 2006. Comparison of Methods to Map California Riparian Areas. Final Report Prepared for the California Riparian Habitat Joint Venture. 85 pp.

[http://www.sfei.org/wetlands/Reports/No522\\_WL\\_RHJVReportFINAL.pdf](http://www.sfei.org/wetlands/Reports/No522_WL_RHJVReportFINAL.pdf)