



May 1, 2007

MANAGEMENT BOARD:

Bay Area Audubon Council
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Complete the Refuge
Ducks Unlimited
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PG&E Corporation
Save San Francisco Bay
Association
Sierra Club
The Bay Institute
The Conservation Fund
Urban Creeks Council

Song Her, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

RE: Comment Letter-Wetland and Riparian Protection Policy

Dear Members of the State Board:

I am writing on behalf of the San Francisco Bay Joint Venture (SFBJV) in support of Option 4. This alternative would cover areas not currently being protected by federal or other regulations and supports the SFBV goals.

The SFBJV is a partnership of non-governmental organizations, utilities, landowners, and non-voting agencies working collaboratively to protect, restore, and enhance all types of wetlands, riparian habitats, and associated uplands for the benefit of birds, fish, and other wildlife. The SFBJV's geographic region includes San Francisco Bay and the coasts of San Mateo, San Francisco, Marin, and Sonoma Counties. The SFBJV is one of the fourteen habitat Joint Ventures of the North American Wetlands Conservation Act, a congressional agreement between the United States, Canada, and Mexico. The members of the SFBJV Management Board consist of 27 agencies and private organizations that represent the diversity of wetland habitat interests found in the San Francisco Bay Area. The Region 2 Water Quality Control Board is one of the member agencies.

The SFBJV requests that the State Board adopt Option 4. The State policy should address beneficial uses and waters of the State. It should also address cumulative impacts and should demonstrate compliance with State and federal policies of "no net loss" of wetlands and riparian habitats. The Regional Boards should be responsible for developing the implementation plans that would comply with Option 4 while taking into consideration utility easements and vector control needs.

For the past couple of years, Regions 1 and 2 have been operating under policies similar to Option 4 that were developed with a grant from the US Environmental Protection Agency. SFBJV urges the State Board to work closely with Regions 1 and 2 and to take full advantage of the work of these two regions in order to expedite the process. The SFBJV has been engaged in the Region 2 process. We want to ensure that the work that has been done can be implemented.

Sincerely,

Arthur Feinstein
Chair

Ex-Officio Members:

Bay Conservation &
Development Commission
California Department
of Fish and Game
California Resources Agency
Coastal Conservancy
Coastal Region, Mosquito &
Vector Control District
National Fish and Wildlife
Foundation
National Marine Fisheries
Service
Natural Resources
Conservation Service
Regional Water Quality Control
Board, SF Bay Region
San Francisco Estuary Project
U.S. Army Corps of Engineers
U.S. Environmental
Protection Agency
U.S. Fish & Wildlife Service
Wildlife Conservation Board