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

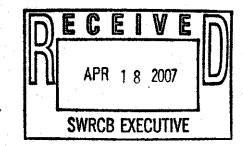
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"EVERYTHING WE KNOW WE HAVE LEARNED FROM NATURE" - RICHARD MANNING

April 18, 2007

Chairperson Tam Doduc and Board Members c/o Song Her, Clerk to the Board State Water Resources Control Board P.O. Box 100 Sacramento, California 95812-0100 via email: commentletters@waterboards.ca.gov

Re: Proposed Wetland and Riparian Area Protection Policy



To the Chair and Members of the Board:

Speaking as an environmental professional with over a decade of experience in endangered species protection in California, including wetland and riparian species and habitats, I wish to submit the following comments on the Board's proposed wetland and riparian area protection policy.

I support the proposed Alternative 4 because it promises to provide a scientific and consistent standard of wetland and riparian protection in California. Even before the SWANCC decision and the federal administration's actions to restrict Clean Water Act regulation of wetland impacts (e.g., as reflected in Army Corps of Engineers' implementation of section 404), regulation of "fill" in "waters of the United States" was at best a confusing and loosely stitched-together fabric. Data showing many benefits of wetland areas are now thoroughly documented; and California wetlands deserve wider and better protection consistent with those benefits. Many parties have private interests in maintaining the status quo, but based on my experience the public interest would be better served if projects consistently were guided away from adverse impacts to wetlands. I believe an argument for Alternative 4 is that it would allow the spectrum of regulated impacts to be scientifically based.

Sincerely,

David H. Wright, Ph.D.