



# California Regional Water Quality Control Board Los Angeles Region



Recipient of the 2001 *Environmental Leadership Award* from Keep California Beautiful

Linda S. Adams  
Agency Secretary

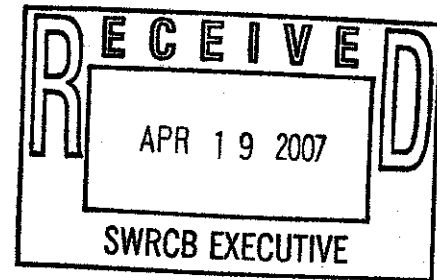
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Arnold Schwarzenegger  
Governor

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

April 19, 2007

Dorothy Rice  
Executive Director  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA, 95814



## COMMENTS ON THE WETLAND AND RIPARIAN AREA PROTECTION POLICY SCOPING DOCUMENT

Dear Ms Rice:

Thank you for the opportunity to comment on the Wetland and Riparian Area Protection Policy Scoping Document. Improving our oversight and protection of these areas is a priority for our Region. This Regional Board adopted Resolution No. 2005-002 on January 27, 2005 with the expressed goal of developing new policies for the Los Angeles Region to control adverse impacts from hydromodification on water quality. A State Board policy would be welcome and useful guidance for our efforts.

Both Alternative 3 ("Develop a New State Policy to Regulate Impacts of Dredge or Fill Material Discharges on Wetlands and Riparian Areas") and Alternative 4 ("Develop a New State Policy to Regulate a Variety of Discharges and Activities that Impact Wetlands and Riparian Areas") have several components which would be particularly valuable to our efforts in the Los Angeles Region.

- Both alternatives would create consistency between the Regional Boards and other State agencies such as the California Department of Fish and Game and the California Coastal Commission. Consistent definitions of wetlands and riparian areas, and the beneficial uses assigned to them, as well as wetland and riparian functions, will lead to more consistent and appropriate regulation and protection of these areas.

**California Environmental Protection Agency**



Our mission is to preserve and enhance the quality of California's water resources for the benefit of present and future generations.

Dorothy Rice  
Executive Director  
State Water Resources Control Board

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- Both alternatives would develop performance standards for the functionality of wetlands created for mitigation. Meaningful performance standards are essential to improve the success of wetland mitigation projects in our Region.

However, we find Alternative 4 superior to Alternative 3 in that it addresses a broader array of concerns. It includes other types of reasonably foreseeable discharges and activities that may negatively impact wetlands and riparian areas; unlike the latter policy which focuses exclusively on dredge and fill discharges. These additional activities such as hydromodification, land and vegetation clearing, and invasive species should be given similar consideration in the protection of any wetland and riparian areas of concern. This Regional Board, therefore, supports Alternative 4 as the policy that would more comprehensively move us forward in our efforts to protect California wetlands and riparian areas.

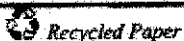
Thank you again for the opportunity to comment on this scoping document. For further discussion, or questions regarding these comments, please contact me at (213) 576-6609 or Ginachi Amah at 213 576-6685.

Sincerely,



Deborah Smith  
Chief Deputy Executive Officer

**California Environmental Protection Agency**



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