



Song Her, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box100
Sacramento, CA 95812-0100

Honorable Board Members,

The Coachella Valley Water District (CVWD) provides domestic water, wastewater, recycled water, irrigation/drainage, regional stormwater protection and groundwater management services to a population of 274,650 throughout the Coachella Valley in Southern California. CVWD supports the State Water Resources Control Board's protection of wetland and riparian resources and submits the following comments to your scoping document for your consideration:

CVWD supports Alternative 3 with the provision that this approach include the following special considerations:

Special consideration must be given to coordination of permitting between agencies so as to minimize conflicting guidance given to the regulated community by different agencies and so as to maximize functional sustainability of wetlands through pooling of resources. To that end, common guidelines and procedures among the state and federal agencies minimize confusion and conflict, and deviations should be for special cases only (i.e. to extend state protection to riparian woodlands and vernal pools). Mitigation decisions and cumulative impacts should be determined within the context of the watershed and existing regional conservation planning. If a regional effort such as a Natural Community Conservation Plan is protecting wetlands, coordination to meet or enhance joint conservation goals must be included in guidance for the regional boards.

Special consideration must be made for stormwater channels and drains since the current regulatory environment fosters a "scorched earth" approach to removal/prevention of vegetative growth in stormwater facilities. A maintenance exemption such as the one the Army Corps is considering for stormwater facilities will improve public safety and foster better wetlands and water quality in the long term.

Special consideration must be made to provide a true functional approach to wetlands with an emphasis on ephemeral streams. Patches of invasive weeds, even if they can be defined as "wetlands", are detrimental to functioning wetlands in the region since they serve as weed sources and population sinks. Too often resources have been wasted on regulating impacts to invasive weeds or ephemeral streambeds with minimal influence on wetlands. We recommend guidelines for wetland and riparian protection are drafted with the inclusion of wetland ecologists who can help prioritize the use of resources for maximum functional effect.

Unfortunately, the diversion of waters in California has often resulted in losses of wetlands and riparian woodlands. Some of these wetland functions have been replaced by wetlands created from urban discharges. Consistency within the State Water Resources Control Board policies toward urban discharge and the beneficial uses of wetlands will enable us to make best use of available waters to enhance, create and maintain wetlands and riparian resources in the state.

Thank you for your consideration,

Steve Robbins
General Manager-Chief Engineer
Coachella Valley Water District