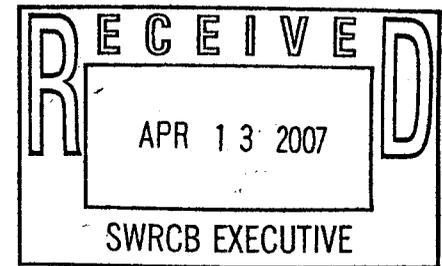


From: "R M Beauchamp" <mitch@psbs.com>
To: <commentletters@waterboards.ca.gov>
Date: Fri, Apr 13, 2007 1:34 PM
Subject: Comment Letter "Wetland and Riparian Area Protection Policy"



Dear Ms. Marsh,

As a biological consultant for a private firm in Southern California for the past 30 years I have been involved with wetland regulation at all levels. It has been my experience that neither the California Water Quality Control Board, nor its Regional Boards, are competent to bring about a positive result in the protection of wetland habitat through regulation. They have, however, been successful in providing a strong base of employment for biological consultants such as me. The bureaucratic processes of the Board are the reason why California is not a prime locale for business and growth. The stagnate economy of the state is due, in large part, to the self-castration that the state imposes upon itself by processes and proposed further regulation, such as this one.

Of the Alternatives that the CEQA process provides in the assessment of your proposed Wetland and Riparian Area Protection Policy and resulting regulations, Alternative 1 is the most apt in light of the triplication that would be generated should any of the other Alternatives be adopted. The Corps of Engineers' 404 activities are certainly adequate to protect wetland resources in the state. That is essentially duplicated by the Fish and Game's Streambed Alteration Agreement activity which has gone way beyond what the intent of the law is. U.S. Fish and Wildlife Service also has its own criteria for what is a wetland also and implements its will through the Endangered Species Act or other avenues not intended for that use.

The Regional Boards are not capable of enforcing additional regulation, much less what they have on their plate now. Most of the staff are inexperienced young people just out of college who don't have any understanding of what significant wetlands are. They will just continue to read cookbook regulations and mindlessly push paper when provoked...until they find a better job and move on.

As a Member of the Technical Advisory Committee of the Office of Spill Prevention and Response (but speaking here as a private citizen), I see how regulations are for state employees who can't or don't want to think about what positive result their actions or inactions will have in the long range preservation of the resource they are charged with protecting. They just want to protect their paychecks and pensions.

The State of California is still bankrupt and there are no funds to enforce these triplicate regulations. The San Diego Regional Board runs from one problem to the next and never can complete an action in a timely fashion. As Chairman of a public water agency (but speaking here as a private citizen), I have seen this incompetence all too often and the damage it does in my ability to provide safe drinking water to my public.

Wetlands protection works now in California under the present regulations. Don't try to fix it. The CEQA process should show that Alternative 1 is the Preferred Action.

Regards,

R. Mitchel Beauchamp. M. Sc.,

President

Pacific Southwest Biological Services, Inc.

Tierra Madre Consultants, Inc.

Post Office Box 985

National City CA 91951-0985

619 477 5333

--

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.5.446 / Virus Database: 269.4.0/759 - Release Date: 4/12/2007 7:58 PM