

# Northern California Conservation Planning Partners

East Contra Costa  
County HCP/NCCP

Placer County  
Conservation Plan

South Sacramento  
HCP

San Joaquin County  
HCP

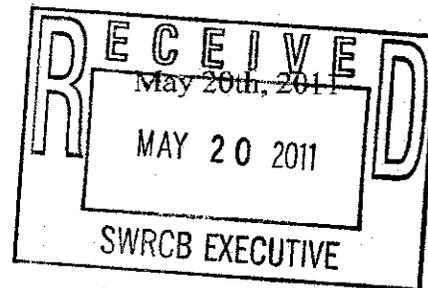
Santa Clara Valley  
HCP/NCCP

Solano HCP

Yolo Natural Heritage  
Program

Yuba - Sutter  
HCP/NCCP

Jeanne Townsend, Clerk to the Board  
State Water Resources Control Board  
PO Box 100  
Sacramento, CA 95812



Comment letter - CEQA - Wetland Area Protection Policy and Regulations

Dear Jeanne Townsend,

Thank you for the opportunity to comment on the preparation of a program-level environmental impact report (EIR) for the proposed Wetland Area Dredge and Fill Regulations.

We ask that the EIR examine the environmental benefits of a programmatic approach to wetland dredge and fill permitting in coordination with regional Habitat Conservation Plans (HCPs) and Natural Community Conservation Plans (NCCPs) prepared by local government at the county, sub-county, or multi-county scale.

Several regional HCPs and NCCPs in northern California are addressing conservation and mitigation for a broad array of aquatic resources, including vernal pools and other wetlands. These conservation plans provide for the permanent protection of high quality wetland areas, and important upland functions in large, landscape-scale preserves. They also provide an approach to avoidance (when appropriate), minimization, and compensatory mitigation that maximizes long-term wetland values and viability. These HCPs and NCCPs will result in the creation of large scale, high quality habitat preserves with funded programs for monitoring and management, and adaptive management. This is a far superior option than traditional project-by-project permitting and mitigation strategies that have often, in the past, resulted in small unmanaged fragmented preserves that are not sustainable and result in loss of important upland functions (such as wildlife movement).

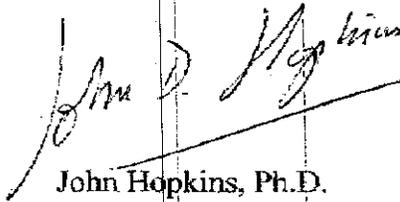
The U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, and appropriate Regional Water Quality Control Boards are actively engaged in these HCP and NCCP efforts to create regional scale approaches to their regulatory program goals. We



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have submitted comments on the benefits of these regional approaches in the past and recommended that the Wetland Dredge and Fill Regulations include a mechanism for coordinating these regional permitting approaches with HCPs and NCCPs.

Sincerely,

A handwritten signature in cursive script, appearing to read "John D. Hopkins". The signature is written in dark ink and is positioned above a horizontal line that extends to the right.

John Hopkins, Ph.D.  
Coordinator