

Public Cmt /Wrkshp (1/31 & 2/8)  
CEQA-Wetlands Policy & Reg  
Deadline: 5/20/11 by 12 noon

MARIN BAYLANDS ADVOCATES

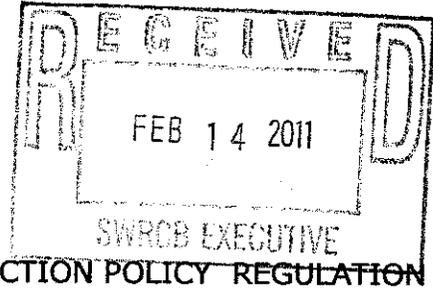


P.O. BOX 2598

MILL VALLEY, CALIFORNIA 94942

February 7, 2011

Jeannie Townsend, Clerk to the Board  
State Water Resources Control Board  
Division of Water Quality  
P.O. Box 100  
Sacramento, CA 95812



RE: COMMENT LETTER-CEQA- WETLAND AREA PROTECTION POLICY REGULATION

Dear Ms Townsend:

Marin Baylands Advocates is a non-profit organization focused on protecting baylands along San Francisco and San Pablo Bays primarily in Marin County. The wetland definition and participation of the Regional and State Boards as proposed in the Initial Study for Wetlands Area Protection Policy and Dredge and Fill Regulations would be a significant benefit to protecting non-tidal wetlands in baylands throughout the bay.

We strongly advocate and urge the State Board to proceed with the process of adopting these proposed policies and regulations and offer the following issues to address in the DEIR:

- the types of wetlands that would be covered by the proposed definition compared to wetlands regulated under the current Corps definition
- a description of the regulatory process that would be undertaken by Regional Boards
- adequate buffer zones around wetlands to protect all resource uses
- mitigation ratios for unavoidable loss of wetlands
- definition of the area within which mitigation could occur. Our concern is that watersheds not be defined so broadly that the local benefits of wetlands are lost
- that any unavoidable loss of wetlands be mitigated so that there is no net loss of wetlands

We are particularly interested in establishing the new regulatory program because significant diking of San Francisco and San Pablo Bay tidal marshes over the last 150 years has resulted not only in the destruction of tidal marshes but in the creation of expanses of diked lands, many of which are in agriculture and function as seasonal wetlands but lack all parameters required by the Corps definition.

We support the proposed definition and regulatory program because we consider that it would be a significant improvement over the current regulatory situation. Therefore, we urge you to proceed with the process without delay.

Sincerely,

A handwritten signature in cursive script that reads "Susan Ristow".

Susan Ristow

Marin Baylands Advocates