



bay restoration commission

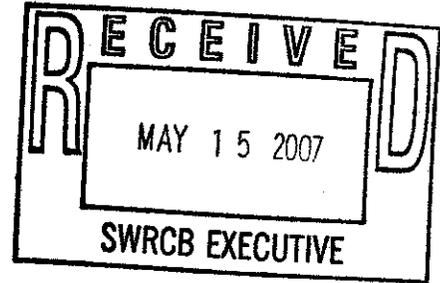
STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission / 320 west 4th street, ste 200; los angeles, california 90013
213/576-6615 phone / 213/576-6646 fax / santamonica bay.org

Wetland/Riparian Policy
Deadline: 5/15/07 12 noon

May 15, 2007

Board Members
State Water Resources Control Board
Division of Water Quality
P.O. Box 100
Sacramento, CA 95812-0100



Re: Proposed Wetland and Riparian Area Protection Policy

Honorable Board Members:

Thank you for the opportunity to comment on the Proposed Wetland and Riparian Area Protection Policy. The Santa Monica Bay Restoration Commission (SMBRC) is an independent state organization with the mission to restore and enhance the Santa Monica Bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the Bay's benefits and values. As a National Estuary Program of the US EPA and a regional, multi-stakeholder agency, the Santa Monica Bay Restoration Commission (SMBRC) is actively involved in conserving and restoring important wetland and riparian habitats of the Santa Monica Bay ecosystem. The SMBRC supports the development of a state Wetland and Riparian Area Protect Policy to ensure the few remaining wetland and riparian areas in California are preserved, along with the beneficial uses and ecosystem values provided by these important natural resources.

Please accept the comments below as support for the expansion and adoption of Alternative 4 of the Wetland and Riparian Area Protection Policy. The SMBRC supports an Alternative 4 which will provide consistency with and expand upon other state agency definitions. Alternative 1-3 are all limited in scope and will not address all impacts to wetland and riparian areas, and will limit the ability to protect these natural systems which provide significant water quality benefits.

The SMBRC would request the State Water Board consider the following when selecting a preferred alternative:

- The Santa Monica Bay Plan identifies connection between Bay health and watershed health. Impacts to riparian corridors result in degradation of the Santa Monica Bay, including accumulation of toxics, nutrients (red tides), bacteria, and dramatic loss of native fisheries, notably steelhead trout.
- Stream and wetland loss severe throughout the state, particularly severe in urbanized Los Angeles area. Impacts not just habitat but also quality of life for urban residents with no connection to nature (NDD)
- The Santa Monica Bay Plan has a goal of 100 miles of riparian restoration, provides funds for restoration. Cost of restoration much more expensive than presevation of existing remaining resources.

our mission: to restore and enhance the santa monica bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the bay's benefits and values





bay restoration commission

STEWARDS OF SANTA MONICA BAY

santa monica bay restoration commission / 320 west 4th street, ste 200; los angeles, california 90013
213/576-6615 phone / 213/576-6646 fax / santamonica bay.org

- Mitigation too often focuses on maintaining the vegetation of a riparian system but doesn't adequately re-establish the hydrology of the system, which is essential for long term survivability of the mitigation. Mitigation basically life-support for the species dependent upon the array of functions that real streams provide.
- Dry (intermittent and ephemeral) streams and wetlands – including vernal pools and springs - are unique and largely unprotected habitats
- Protection should include floodplain, otherwise hydromods inevitable for public safety; SWRCB could also accordingly rescope existing funding programs to incorporate floodplain acquisition as part of overall WQ attainment goals. Preventing hydromodification and restoring hydromodified streams should be seen as integral to addressing water quality problems.

our mission: to restore and enhance the santa monica bay through actions and partnerships that improve water quality, conserve and rehabilitate natural resources, and protect the bay's benefits and values

