

September 5, 2017

Felicia Marcus Chair and Board Members  
State Water Resources Control Board  
1001 I street  
Sacramento, CA 95814



Dear Chairman Marcus and members of the Board:

My name is Vicky Hoover, and I have long been concerned about proper safeguards for our state's wetland resources—the ecological and other values of which are becoming newly apparent each year. Today, I wish to express my support for the proposed statewide wetlands policy regulation (“Procedures for Discharges of Dredged or Fill Materials to Waters of the State”), and ask you and the other board members to do the same. California has lost over 90% of its historic wetlands, and we must do all we can to stop further harm, protect what remains, and rebuild some of what we've lost.

Wetlands provide important habitat for many native species in this state, such as birds, fish, reptiles, and amphibians. Wetlands improve water quality by filtering water. They can also provide key protections from the rising ocean levels that climate change will bring.

Despite all of this, the President has recently acted to roll back federal protections for wetlands. This is wholly unacceptable, and California must do all it can to protect our state's resources from federal inaction. The State Water Resources Control Board stands in a unique position to lead in the face of federal retreat. I urge you to use your authority to adopt the statewide wetlands policy.

However, before this policy is adopted, it needs to be strengthened in at least two ways: first, because restored wetlands or wetlands created specifically to make up for the destruction of other wetlands by some kind of development project do not perform as well as natural wetlands or, it takes maybe a decade or more before they really start to function as they should, I ask the Board to insist that under the new compensatory mitigation policy every wetland acre destroyed or degraded must be mitigated by at least an acre of newly restored or created wetlands. This will help comply with the State's “no net loss” of wetland acreage or function policy.

Secondly, with regard to the Alternatives Analysis” to show why the project couldn't be undertaken on a non-wetland site – that the proposed policy regulation rightly requires, unfortunately there seems to be a loophole, in the statement that a Regional Water Board can ignore the Alternatives Analysis requirement for any project and it doesn't even have to provide a reason.. Instead, the State Water Board should insist that an Alternatives Analysis must be performed for every project—no exceptions.

Sincerely,

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