



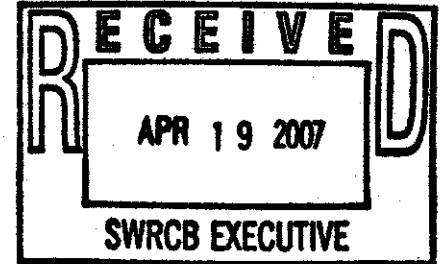
Wetland/Riparian Policy
Deadline: 4/19/07 12 noon

Protecting and Restoring the Santa Barbara Channel and Its Watersheds

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April 19, 2007

Song Her, Clerk to the Board
Executive Office
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100



Re: Comments on Wetland and Riparian Area Protection Policy Scoping Document

Dear Ms. Her:

Please accept the following comments on the Wetland and Riparian Area Protection Policy Scoping Document, which are hereby submitted by Santa Barbara Channelkeeper. Santa Barbara Channelkeeper is a local non-profit organization dedicated to protecting and restoring the Santa Barbara Channel and its watersheds through citizen action, education, field work and enforcement. One of our organization's primary goals is to protect local wetlands, such as the Goleta Slough, Carpinteria Salt Marsh, and Ormond Beach Wetlands, which have been degraded and decimated by development and pollution.

As outlined in the Scoping Document, the State of California has lost more than 90 percent of its historic wetland acreage, and between 85-98 percent of its historic riparian areas, and these losses have resulted in substantial impairments to water quality. Wetlands and riparian areas provide numerous environmental services and values, including by providing habitat for thousands of species, absorbing excess nutrients, sediment and other pollutants before they reach waterbodies, recharging groundwater, and storing floodwaters, among others. Due to the SWANCC and Rapanos decisions, there now exist significant gaps in the protection of these critical areas. Moreover, there is a lack of consistent statewide definitions of wetlands and riparian areas as well as their beneficial uses.

The State has the opportunity, and in fact a mandate, to fill these gaps. Our wetlands and riparian areas are of vital importance to the economy and environment of the State, and they deserve no less than the maximum level of protection.

As such, only Alternative 4 as outlined in the Scoping Document would provide an adequate level of protection for our critical wetlands and riparian areas. Santa Barbara Channelkeeper therefore strongly urges the SWRCB to adopt Alternative 4 as the preferred alternative in the Environmental Impact Report to be prepared pursuant to the California Environmental Quality Act, and to proceed as quickly as possible with the development of a new state policy to regulate a variety of discharges and activities that impact wetlands and riparian areas. Only Alternative 4



will fully and sufficiently address the current lack of clarity in the existing regulatory framework for protecting those wetlands and riparian areas no longer regulated under the federal Clean Water Act; the lack of statewide consistency in the definitions of wetlands and riparian areas and of beneficial uses and requirements for evaluating wetland and riparian area condition; and the urgent need for a comprehensive framework for protecting wetlands and riparian areas, including minimum statewide requirements for the full range of discharges and activities that may impact them, not only dredge and fill.

Thank you for the opportunity to submit these comments, and for your efforts to move forward on the development of a statewide policy to protect our invaluable wetland and riparian areas.

Sincerely,

/ss/ Kira Redmond

Kira Redmond
Executive Director