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Mr. Paul Modrell San Francisco Bay Regional Water Quality Control Board 1515 Clay Street, Suite 1400 Oakland, CA 94612

July 17, 2013

Re: Sonoma Marin Area Rail Transit 401 application for Initial Operating Segment-1 South Project

Dear Mr. Modrell:

The Marin Conservation League just got word of the 401 permit being processed by you for the above-referenced SMART project. Since we have only been able to give the materials brief review, the most glaring shortcoming has been the inadequate wetland mitigation offered.

Marin has a county standard of 2:1 mitigation for wetlands destroyed by projects. The 1:1 mitigation may be acceptable for temporary disturbance, but 2:1 should be required, in kind, for wetlands destroyed by the construction. We also recommend that any wetland mitigation be done as near to the disturbed/destroyed wetland as possible or at least in the same watershed.

Thank you for the opportunity to comment.

Yours truly,

David Schnapt
President

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