August 22, 2011

The Honorable Edmund G. Brown, Jr.
Governor
State of California
State Capitol
Sacramento, CA  95814

RE:  State Water Resources Control Board and Wetlands

Dear Governor Brown:

The above coalition has concerns about a recent proposal by the State Water Resources Control Board to change the state definition of “wetlands.” The proposed change is pre-emptive of a recently-convened federal discussion on wetlands and could have significant impacts on public and private property, transportation and other development projects, throughout the state.

The proposed change not only substantially broadens the lands that could potentially be affected, but – because it would be substantially out of sync with a well-established federal definition of wetlands – it might double the permitting burden for projects, slowing the process of transportation and building projects, including the expenditure of state bond funds. Slowing the expenditure of public and private building funds will have a significant jobs impact on the state.

Please consider intervening with the State Water Board, asking the Board to await the outcome of federal action before creating a new statewide standard in a vacuum that is duplicative or could lead to litigation and delays.

Thank you for your consideration of this request.
Sincerely,

Paul Meyer  
American Council of Engineering Companies  
California

Thomas Holsman  
Associated General Contractors of California

John Coleman  
Bay Planning Coalition

Jim Earp  
California Alliance for Jobs

Richard Lyon  
California Building Industry Association

Rex S. Hime  
California Business Properties Association & National Association of Industrial Office Properties

Justin Oldfield  
California Cattlemen’s Association

Valerie Nera  
California Chamber of Commerce

Gary Hambly  
California Construction and Industrial Materials Association

Kari Fisher  
California Farm Bureau Federation

David Bischel  
California Forestry Association

Trudi Hughes  
California League of Food Processors
Mike Rogge
California Manufacturers and Technology Association

Karen Keene
California State Association of Counties

Jose Mejia
California State Council of Laborers

Mark Grey
Construction Industry Coalition on Water Quality

Gary Toebben
Los Angeles Area Chamber of Commerce

James V. Camp
National Association of Industrial and Office Properties – SoCal Chapter

Reed Hopper
Pacific Legal Foundation

Kathy Mannion
Regional Council of Rural Counties

Bill Davis
Southern California Contractors Association

Gail Delihant
Western Growers Association

Kevin Buchan
Western States Petroleum Association

Mike Falasco
Wine Institute

Andrew Henderson
Building Industry Legal Defense Foundation

Larry Forester
Coalition for Practical Regulation

Jelisaveta Gavric
California Association of Realtors®