

California Conference of Carpenters

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Public Cmt /Wrkshp (1/31 & 2/8)
CEQA-Wetlands Policy & Reg
Deadline: 5/20/11 by 12 noon

Robert Alvarado
Ex. Sec. Treasurer

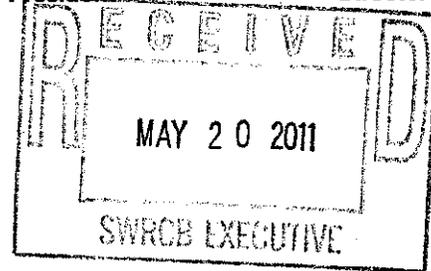
Douglas J. McCarron
President

Mike McCarron
Vice-President

Daniel M. Curtin
Director

May 19, 2011

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 "I" St., 24th Floor
Sacramento, CA 95814



RE: Draft Program EIR for proposed Wetland Area Protection Policy and Dredge and Fill Regulations

Dear Ms. Townsend:

I am writing on behalf of the California Conference of Carpenters to express our opposition to the State Water Resources Control Board's proposal to change the state definition of "wetlands" for two reasons.

First, it is our understanding that the proposal will significantly increase the amount of state land classified as wetland and goes beyond the well-established federal definition of wetlands. We believe these changes will add significant costs and result in a substantial slowing of transportation and other building projects, both public and private, in the midst of the most severe economic crisis in California in over seven decades. California unemployment has been over 12% for more than a year and over 10% for more than two years. Short of an environmental crisis that matches or surpasses California's current economic crisis this proposal should be shelved. We strongly support environmental improvement but just as strongly believe that at this time a balanced approach is called for that does not damage desperately needed economic growth and the jobs that will come with it.

Secondly, the federal government has convened a discussion around this very same issue. Rather than confuse the situation with a hurried proposal in California that may damages our already ailing economy, we believe it would be wise to allow the federal process to finalize its proposals which could provide guidance to our own efforts.

Thank you for your consideration of this request.

Sincerely,

Daniel M. Curtin
Director

Cc: Nancy McFadden, Governor's Office