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August 31, 2017

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

**Re: Opposition to the Draft State Wetland Definition and  
Procedures for Discharges of Dredged or Fill Materials**

This firm represents the Center for Balanced Land Use, Inc., a California nonprofit corporation ("CBLU").

CBLU opposes the State Water Board's draft State Wetland Definition and Procedures for Discharge of Dredged or Fill Materials to Waters of the State.

Presently, there are too many overlapping regulatory regimes protecting wetlands and jurisdictional wetlands. Another one is not needed.

Federal law protects wetlands and having multiple state agencies regulate the same resource, except with differing, complicated and inconsistent rules (seemingly designed to be traps for the unwary) unduly burdens property owners with marginal, if any, additional benefit, to the environment.

The State Water Board should scrap the proposed new definition and rules.

Sincerely,

/s/

Tom Roth