



The Juneau Chamber of Commerce

9301 Glacier Hwy, Suite 110 • Juneau AK 99801

Board Members

Lance Stevens, Pres.
Alaska USA FCU
Max Mertz, Past Pres.
Elgee Rehfeld Mertz
Bill Peters, Secretary
True North FCU
Dan Fabrello, Treasurer
Jensen Yorba Lott
Bruce Abel
Don Abel Building Supply
Travis McCain
Alaska Litho
Larry Gaffaney
Huna Totem Corp.
Hayden Garrison
Creative Source
Charlie Williams
Valley Paint Center
Linda Thomas
Alaskan Brewing Co
Rustan Burton
Juneau Empire
Eric Eriksen
AEL&P
Erica Simpson
Alaska Excursions
Richard Burns
ABC Stations
Dan Bruce
Baxter, Bruce & Sullivan

Benefactor Members

Alaska Airlines
Alaska Communications
Alaska Marine Lines
Exxon Mobil
Fred Meyer
Juneau Empire
Huna Totem Corp
Juneau Radio Center
Northrim Bank
Sealaska

Platinum Members

AEL&P
Alaska USA FCU
Alaskan Brewing Company
Allen Marine
Bartlett Regional Hospital
BP Alaska
CBJ (Manager's Office)
Capital Office Systems
Chatham Electric
Coeur Alaska, Inc.
ConocoPhillips
Coogan Construction
Elgee Rehfeld & Mertz
First Bank
First National Bank of Alaska
Goldbelt, Inc.
Hecla Greens Creek Mining
Key Bank
SEARHC
Shattuck & Grummett
Samson Tug & Barge
Taku Oil
True North FCU
UAS
Wal-Mart
Wells Fargo Bank of Alaska
Wostmann and Associates

June 8, 2015

Senator Lisa Murkowski
United States Senate
709 Hart Senate Building
Washington, D.C. 20510

Senator Dan Sullivan
United States Senate
702 Hart Senate Office Building
Washington, D.C. 20510

Congressman Don Young
House of Representatives
2314 Rayburn House Office Building
Washington, D.C. 20515

Re: Definition of "Waters of the United States" Under the Clean Water Act, 79 Fed. Reg. 22,188 (April 21, 2014): Docket No. EPA-HQ-OW-2011-0880

Dear Senator Murkowski, Senator Sullivan and Representative Young:

The US Chamber of Commerce has previously petitioned the officials of the Environmental Protection Agency and the Department of Army, Civil Works regarding the proposed rule referenced above. In turn, the Juneau Chamber of Commerce is one of many organizations and groups who have signed onto their letter. While I have simply listed the suggested talking points on this matter, I wanted to take the time personally to write and encourage all of you to oppose this action. I certainly agree with the following concerns.

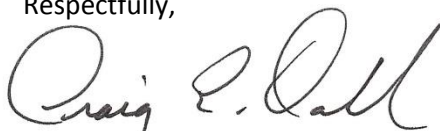
EPA and the U.S. Army Corps of Engineers have proposed to vastly expand the amount of "waters" – and adjacent land areas – that are under federal control.

The proposed "waters of the United States" rule will hit existing facilities/operations and future facilities/operations by expanding EPA's authority to place restrictions on land use and make many more activities subject to a CWA permit.

- Maps prepared by EPA show the rule would expand federal jurisdiction over waters from 3.5 million river and stream miles to well over 8 million river and stream miles;
- The rule would make industrial ditches into “tributaries” and maintenance activities in ditches and other “tributaries” would trigger costly dredge and fill permits;
- Work in stormwater retention ponds, fire ponds, and on-site impoundments will also trigger dredge and fill and point source discharge permits;
- These permitting requirements can open a business to citizen group lawsuits, and lengthy environmental reviews (e.g. NEPA and the Endangered Species Act);
- Under the proposal, even if a project can get a permit, businesses will often have to agree to mitigate environmental “damage” with costly restoration/mitigation projects;
- Linear projects such as a highways, power lines, pipelines, etc. will have to obtain additional permits and much greater scrutiny in order to be approved;
- The proposal will likely also affect current stormwater management requirements, which may affect retailers, companies with large parking lots, “big box” stores, etc.

The proposal does little or nothing to actually improve water quality. Instead, it gives EPA and the Corps virtually limitless authority to control which project and commercial activities can go forward.

Respectfully,



Craig E. Dahl
Executive Director
Juneau Chamber of Commerce

[Type text]