

**American River Conservancy • Bear Yuba Land Trust  
California Coastkeeper Alliance  
California Sportfishing Protection Alliance  
Center for Biological Diversity  
Central Sierra Environmental Resource Center  
Clean Up the Lake • Clean Water Action  
Environmental Law Foundation • Friends of Plumas Wilderness  
Friends of the Inyo • Los Padres ForestWatch  
North Fork American River Alliance • Save California Salmon  
Sierra Nevada Alliance • South Yuba River Citizens League  
Sustainable Tahoe • The Sierra Fund • The Sugar Pine Foundation  
Ventana Wilderness Alliance**

March 5, 2021

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812-  
[commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

**RE: Suction Dredge Mining NPDES Permit**

Dear State Water Resources Control Board,

On behalf of twenty conservation, fisheries, and community groups we are submitting these comments on the proposed Statewide National Pollutant Discharge Elimination System (NPDES) Permit for Suction Dredge Mining Discharges to Waters of the United States by the State Water Resources Control Board (State Water Board). The adverse impacts of suction dredge mining to water quality, wildlife, public health, recreational activities, and cultural resources are well documented.

Suction dredging pollutes waterways by stirring up sediment and heavy metals such as mercury from historic mining. It damages streambeds that are essential for salmonids, and it disturbs aquatic and riparian habitat for a wide range of wildlife. Suction dredging threatens important tribal and cultural resources, such as riverscapes and sacred places. It also discourages swimming, fishing, boating, and quiet recreation with noisy, polluting equipment and undermines taxpayer dollars spent on wildlife restoration and water-quality improvements.

The State Water Board previously recommended that suction dredge mining “[be permanently prohibited](#)” because of its water quality impacts and we urge the State Water Board to maintain that prohibition because the significant environmental effects of the activity cannot be fully mitigated. Should the State Water Board move forward to issue a permit for suction dredge mining it must address a range of issues including the ones below.

The State Water Board must maintain strong prohibitions on suction dredge mining in areas where there has been historic gold mining or that have high levels of heavy metals, such as mercury. It must also prohibit discharges where basin plans from regional water-quality control boards prohibit point source discharges and areas where the California Department of Fish and Wildlife has prohibited suction dredging.

We also urge the State Water Board to ensure that suction dredge mining does not degrade California's natural resources and require compliance with broader state requirements under the Porter-Cologne Water Quality Control Act. The State Water Board must prohibit mining in waters that are impaired for sediment; areas with rare, sensitive, threatened or endangered species; and areas with cultural, recreational, and aesthetic resources.

Permit descriptions and maps should also accurately describe all areas where suction dredge mining is prohibited—such as National Parks, wilderness areas, and military areas—to avoid confusion and conflicts.

The State Water Board must require that any permit fees are rigorous enough to fully cover all administrative, monitoring and enforcement costs. This is particularly important because of the nature of these operations, which occur in remote areas where there is little oversight. Real-time monitoring is crucial to ensure water-quality violations do not occur. There is no excuse for taxpayers to subsidize this hazardous activity.

Finally, a general permit to allow discharges is not appropriate because site- and operation-specific impacts can only be analyzed on a permit-by-permit basis.

We urge you to continue prohibitions on suction dredge mining pollution and fully address a range of deleterious impacts from suction dredge mining if a permit is issued.

Sincerely,

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