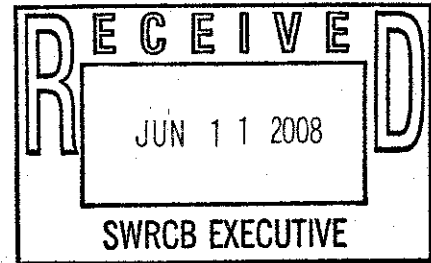




NATURAL RESOURCES DEFENSE COUNCIL

June 11, 2008



Via electronic mail and U.S. mail

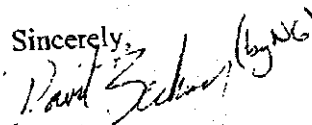
Chairwoman Doduc and Board Members
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814

**Re: Comments on the Draft General Permit for Discharges of Storm Water
Associated with Construction and Land Disturbance Activities**

Dear Chairwoman Doduc and Members of the Board:

On behalf of the Natural Resources Defense Council and our 120,000 California members, we are writing with regard to the State Water Resources Control Board's ("State Board") draft General Permit for Discharges of Storm Water Associated with Construction and Land Disturbance Activities ("Draft Permit"). As currently written, the Draft Permit represents an unacceptable departure from the requirements of the Clean Water Act, and fails to adequately protect water quality in the state. We are deeply troubled by the Draft Permit's continued reliance on measures that have proved difficult, if not impossible, to enforce and the State Board's continued failure to require that the Permit include meaningful numeric effluent limitations. We are further concerned by the current iteration of the Draft Permit's illicit authorization of discharges to water bodies listed on the State of California's Clean Water Act Section 303(d) List of Water Quality Limited Segments, exemption from discharge requirements of oil and gas facilities, and its confused and illegal failure to control discharges to all waters of the United States. As such, we write in support of the comments submitted today by the California Coastkeeper Alliance, detailing the many deficiencies of the Draft Permit. We urge in the strongest terms that the State Board carefully consider the issues raised and recommendations contained therein before proceeding further towards adoption of the Draft Permit.

Thank you for your consideration of these issues and please feel free to contact us at (310) 434-2300 if you have any questions regarding this letter.

Sincerely,

David Beckman
Noah Garrison
Natural Resources Defense Council

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