



14 February 2018

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-2000

Re: Proposed Amendment to the Statewide Industrial General Storm Water permit

Dear Ms. Townsend,

Wine Institute is the public policy voice for California wine, representing more than 1,000 wineries and affiliated businesses in the state. This comment letter is in response to the Proposed Amendment to the Statewide Industrial General Storm Water permit (“the permit”).

Our comments pertain only to the proposed amendments in Attachment E relating to the implementation of Total Maximum Daily Loads (TMDL) in the permit.

For the Napa River and Sonoma Creek sediment TMDLs, the proposed amendments would consider compliance with the permit to be compliance with the TMDLs, with no additional requirements.

Because these TMDLs did not assign Responsible Dischargers a percent reduction of sediment loads, it would be inappropriate to impose additional requirements upon these dischargers. The proposed amendments translate these TMDLs properly, in a way that makes sense within the permit’s scope and intent.

We support SWRCB staff’s thoughtful and prudent approach to this issue.

Thank you for the opportunity to comment.

Regards,

Tim Schmelzer

Wine Institute