



Napa County Flood Control and Water Conservation District

PHILLIP M. MILLER, P.E.
DISTRICT ENGINEER



July 20, 2017

NCSPPP
Participants



A Tradition of Stewardship
A Commitment to Service



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

Submitted electronically – commentletters@waterboards.ca.gov

RE: NCSPPP Comment Letter – Small MS4 Permit Amendment

Dear Ms. Townsend:

The Napa Countywide Stormwater Pollution Prevention Program (NCSPPP) is writing to comment on the proposed amendment to the General Permit for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (Small MS4 General Permit), implementing region-specific total maximum daily load (TMDL) requirements (Proposed Amendment).

The NCSPPP is a joint effort of the County of Napa, the Cities of American Canyon, Napa, St. Helena, and Calistoga, and the Town of Yountville, facilitated by the Napa County Flood Control and Water Conservation District. Our program goals are to prevent stormwater pollution, protect and enhance water quality in the Napa River, local creeks and wetlands, preserve beneficial uses of local waterways, and comply with State and Federal regulations.

NCSPPP permittees are named in two TMDLs, one for Sediment and one for Pathogens. While the Phase II Permit provides the mechanism to implement the TMDLs, NCSPPP permittees didn't wait for this and have been working diligently

since TMDL adoption to implement their requirements. We strongly support the comments submitted by CASQA in their letter of July 20, 2017 and would like to provide additional comments of our own that pertain specifically to the Napa River TMDLs for Sediment and Pathogens. Our comments are attached as redline/strikeout versions of the Attachment G language.

We would very much appreciate your consideration of this matter and thank you for the opportunity to comment. If you need any further information, please contact me at 707-253-4823.

Sincerely,



Jamison Crosby
Program Manager

Enclosures: Redline/strikeout of Attachment G for Napa River Sediment TMDL
Redline/strikeout of Attachment G for Napa River Pathogens TMDL

cc: Bill Hereth, State Water Board