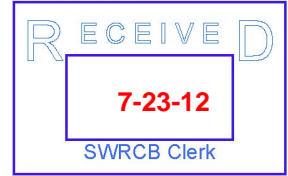


July 18, 2012

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



Bel Marin Keys Community  
Services District

Central Marin Sanitation Agency

City of Petaluma

City of San Rafael

City of Sonoma

County of Marin

County of Sonoma

Las Gallinas Valley Sanitary District

Marin County Stormwater Pollution  
Prevention Program

Marin Municipal Water District

Napa County Flood Control and  
Water Conservation District

Napa Sanitation District

North Marin Water District

Novato Sanitary District

Sonoma County Water Agency

Sonoma Valley County  
Sanitation Agency

Associate Members:

City of Novato

The Bay Institute

Tomaes Bay Watershed Council

Group Members:

City of Mill Valley

Sewerage Agency of  
Southern Marin

Subject: Comment Letter – Phase II Small MS4 General Permit

Dear Ms. Townsend,

This letter is submitted on behalf of the North Bay Watershed Association's (NBWA) regulated agencies in response to the revised draft Phase II Small Municipal Separate Storm Sewer System (MS4) General Permit (draft permit) which expired on May 1, 2008. The NBWA is a group of 16 local public agencies from Marin, Sonoma, and Napa Counties. The organization was created to facilitate regional collaboration among agencies and stakeholders to promote stewardship of the North Bay watersheds. Participants work on water and natural resources issues that impact areas beyond traditional agency boundaries.

Thank you for the efforts to substantially revise the original 2011 draft permit and the opportunity to submit comments on the revised draft permit. Our comments are as follows:

- 1) Only include requirements that an external scientific peer review confirms will result in appreciable improvements to water quality.
- 2) Provide more flexibility in the permit language that will support implementation and prioritization by region or community based on local issues.
- 3) Provide a clear, documented, regulatory path to allow implementation of existing programs that are currently adaptively managed and are protective of water quality to the federal standard of "Maximum Extent Practicable".
- 4) Modify the compliance timelines to provide more time to prepare for the new requirements.
- 5) Only include requirements that can be implemented with existing municipal or county resources or provide an alternative funding mechanism to support implementation (state grant funds tend to go to "on the ground" projects, not implementation of programs).

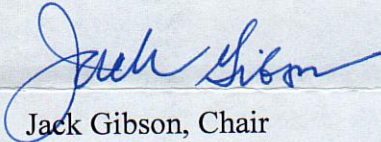
In addition the NBWA Board asked that I emphasize that the new permit should be evidence based, pragmatic, cost effective, and doable.



Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
July 18, 2012  
Page 2

Thank you for your time and for your consideration of our comments. Please contact our NBWA Executive Director, Harry Seraydarian at (415) 389-8237 if you would like to discuss the recommendations in this letter or to coordinate any future meetings.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jack Gibson", is written over a horizontal crease in the paper.

Jack Gibson, Chair

cc: Geoff Brosseau, CASQA  
Jim Scanlin, BASMAA