



# 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, 24<sup>th</sup> Floor  
Sacramento, CA 95814

Submitted electronically – [commentletters@waterboards.ca.gov](mailto: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

**ATTACHMENT G – Region- Specific Requirements**  
**Regional Water Board- Approved TMDLs with urban runoff listed as a source**

TMDL Effective Date Basin Plan Amendment (BPA) Water Board Res. No.	Phase II Municipality Entities	Impaired Water Body	Deliverables/Actions Required/ <del>Waste Load Allocations</del>
<b>Region 2: San Francisco Regional Water Board</b>			
<p><b><u>TMDL for Napa River Sediment</u></b></p> <p>Effective Date: January 20, 2011</p> <p>BPA: Chapter 7, Water Quality Attainment Strategies including TMDLs</p> <p>Resolution R2-2009-0064</p>	<p>City of American Canyon</p> <p>City of Calistoga</p> <p>City of St. Helena</p> <p>City of Napa</p> <p>Napa County</p> <p>Town of Yountville</p>	<p>Napa River</p>	<p><b>Purpose of Provisions</b>  <del>The purpose of these provisions is to implement the requirements of the Napa River sediment TMDL.</del></p> <p><b>TMDL Wasteload and Load Allocations</b>  <del>The Napa River sediment TMDL assigns to municipal storm water a wasteload allocation and load allocation for the roads source category.</del></p> <p><del>The sediment wasteload allocation is 600 tons/year and applies to storm water runoff discharges from municipalities' facilities associated with construction and/or maintenance activities.</del></p> <p><del>The load allocation 27,000 metric tons/year of sediment is for the road and stream crossings category and applies to stream crossings and storm water runoff discharges associated with operation of public and private roads, paved and unpaved, within the watershed not otherwise covered by NPDES permits. Municipalities share this allocation with another entity (i.e., Caltrans).</del></p> <p><b>Requirements for Implementing the <u>Napa River Sediment TMDL Wasteload and Load Allocations</u></b></p> <p><b>A. Implementation of Sediment Wasteload Allocations (WLAs)</b></p> <p>i. To attain the wasteload allocation, municipalities <u>identified in this TMDL section</u> shall comply with the construction and maintenance <u>storm water</u> requirements, <u>sections E.10 and E.11</u>, in this Order.</p> <p><b>B. Implementation of Sediment Load Allocations (LAs)</b></p> <p>i. To attain the shared load allocation of 27,000 metric tons/year, <u>Napa County, municipalities identified in this TMDL section</u> shall <del>determine</del> <u>implement measures</u> opportunities to <u>repair retrofit</u> and/or reconstruction of road crossings to minimize road-related sediment delivery (≤500 cubic yards/mile per 20-year period) to stream channels. Specifically, to reduce road-related erosion and protect stream-riparian habitat conditions, <u>Napa County the municipalities</u> shall by <u>September 30, 2017</u> <del>October 31, 2014; October 31, 2014</del>:</p> <ul style="list-style-type: none"> <li><del>Adopt and Continue to implement best management practices for maintenance of unimproved (dirt/gravel) roads;</del></li> <li><del>Conduct</del> <u>Finalize</u> a survey of stream-crossings associated with paved public roadways, <u>and</u></li> <li><del>Develop By [Hard Date: one year from adoption date], submit a schedule a prioritized implementation plan for the repair repair retrofit and/or replacement of high priority crossings/culverts to the Regional Water Board Executive Officer for approval.</del></li> </ul> <p>For paved roads, erosion and sediment control actions <del>could shall</del> primarily focus on road crossings to meet the <u>performance standard sediment load allocation</u>.</p>

**Commented [jc 1]:** BPA specifies these actions pertain only to Napa County.

**Commented [jc 2]:** BPA specifies the Oct. 31, 2014 date and this compliance date was already met.

**Commented [jc 3]:** There are no publicly-owned unimproved/dirt/gravel roads in Napa County.

**Commented [jc 4]:** BPA says "repair and/or replacement"

**ATTACHMENT G – Region- Specific Requirements**  
**Regional Water Board-Approved TMDLs with urban runoff listed as a source**

TMDL Effective Date Basin Plan Amendment (BPA) Water Board Res. No.	<del>Phase II Municipality</del> <u>Entities</u>	Impaired Water Body	<del>Deliverables/Actions Required</del> <del>Waste Load Allocations</del>
<b>Region 2: San Francisco Regional Water Board</b>			
<u>TMDL for Napa River Pathogens</u>  Effective Date: February 29,	City of American Canyon	Napa River	<p><del><b>Purpose of Provisions</b></del>  <del>The purpose of these provisions is to implement the requirements of the Napa River pathogens TMDL.</del></p> <p><del><b>TMDL Wasteload Allocations</b></del>  <del>The Napa River pathogens TMDL assigns a wasteload allocation to municipal storm water as follows:</del></p>

<sup>2</sup> [2003-0005-DWQ](#)  
 2013-0001-DWQ [as amended by Order 2016-XXXX-DWQ](#)

**ATTACHMENT G – Region-Specific Requirements**  
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2008  BPA: Chapter 7, Water Quality Attainment Strategies including TMDLs  Resolution No. R2-2006-0079	City of Calistoga  City of St. Helena  City of Napa  Napa County  Town of Yountville		<table border="1" data-bbox="716 509 1331 639"> <thead> <tr> <th colspan="2"><i>E.coli</i> (CFU/100 mL)</th> <th colspan="2">Fecal coliform (CFU/100 mL)</th> <th colspan="2">Total coliform (CFU/100 mL)</th> </tr> <tr> <th>Geometric Mean</th> <th>90<sup>th</sup> percentile</th> <th>Geometric Mean</th> <th>90<sup>th</sup> percentile</th> <th>Geometric Mean</th> <th>90<sup>th</sup> percentile</th> </tr> </thead> <tbody> <tr> <td>&lt;113</td> <td>&lt;368</td> <td>&lt;180</td> <td>&lt;360</td> <td>&lt;216</td> <td>&lt;9,000</td> </tr> </tbody> </table> <p data-bbox="716 646 1509 688"><del>These allocations are applicable year-round and apply to any sources (existing or future) subject to regulation by NPDES permit.</del></p> <p data-bbox="716 708 1478 773"><b>Requirements for Implementing the Napa River Pathogens TMDL Wasteload Allocations Municipalities</b> The Phase II entities identified in this TMDL section shall <u>implement the following actions, effective immediately, within 18 months of permit adoption:</u></p> <ol data-bbox="741 773 1539 1166" style="list-style-type: none"> <li>Public Participation and Outreach. Educate the public regarding sources of fecal coliform and associated health risks of fecal coliform in surface waters. Educate the public regarding actions that individuals can take to reduce pathogen loading.</li> <li>Pet Waste Management. <del>Develop and implement</del> enforceable means of reducing/eliminating fecal coliform loading from pet waste.</li> <li>Illicit Discharge Detection and Elimination. <del>Develop and implement</del> strategies to detect and eliminate illicit discharges (whether mistaken or deliberate) of sewage to the Napa River.</li> <li>Pollution Prevention and Good Housekeeping. <del>Develop and implement</del> strategies to reduce/eliminate fecal coliform loading from streets, parking lots, sidewalks, and other urban areas that potentially collect and discharge fecal coliform to the Napa River.</li> <li><del>As indicated in the TMDL, participate in the Regional Water Board-led stakeholder effort to conduct water quality monitoring at baseline monitoring sites.</del></li> <li><del>As part of v.,</del> Conduct baseline water quality monitoring to evaluate <i>E.coli</i> concentration trends in the Napa River and its tributaries. Table 7-g in Chapter 7, Water Quality Attainment Strategies, presents locations and frequency for the required baseline water quality monitoring.</li> <li>Report <del>annually</del> <u>yearly, in the Annual Report,</u> (on <del>water quality monitoring results and participation in the stakeholder group and</del> progress made on implementation of human and animal runoff reduction measures.</li> </ol> <p data-bbox="716 1185 1514 1227"><u>The load allocations identified in the Fact Sheet of this Order are incorporated by reference. A final compliance deadline for compliance with the LA is not specified in the TMDL.</u></p>	<i>E.coli</i> (CFU/100 mL)		Fecal coliform (CFU/100 mL)		Total coliform (CFU/100 mL)		Geometric Mean	90 <sup>th</sup> percentile	Geometric Mean	90 <sup>th</sup> percentile	Geometric Mean	90 <sup>th</sup> percentile	<113	<368	<180	<360	<216	<9,000
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**Commented [jc 1]:** The BPA does not include this specific information and the permittees should be given the opportunity to identify the "specific measures to reduce discharge of human and animal waste".