



# Napa County Flood Control and Water Conservation District

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**ACTING DISTRICT ENGINEER**

May 23, 2012

Mr. Fred Hetzel  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

**Subject: Comments on Waste Discharge and Water Quality Certification for the Napa County Stream Maintenance Program**

Dear Mr. Hetzel,

Thank you for working with the Napa County Flood Control and Water Conservation District (the District) in reviewing our recently developed Stream Maintenance Manual (SMM) and preparing a Waste Discharge Requirement and Water Quality Certification. The District accepts the vast majority of the provisions described in the permit and appreciates the SFBRWQCB feedback on the SMM. There is one issue that the District has identified in the current permit language, which relates to the submittal date for the Annual Workplan (provision 28 on page 7).

Provision 28 requires the submittal of an Annual Workplan to the SFBRWQCB's Executive Officer by March 15<sup>th</sup> of each year. In the SMM (*Chapter 10 Program Management*) the District has outlined a general program timeline that fits with the District's annual work cycle. The SMM's timeline begins with Stream Reconnaissance and Assessment (page 10-2) in April of each year, which includes the District's annual stream surveys to assess potential maintenance needs. To be clear no maintenance work is being performed during the Stream Reconnaissance and Assessment, activities during stream surveys are limited to observation and data collection. The findings from the Stream Reconnaissance and Assessment inform the District's project descriptions and the development of the Annual Workplan as described on page 10-4 of the SMM. The SMM currently states that the annual Workplan (Annual Notification) would be submitted by June 15<sup>th</sup> of each year (page 10-6).

The District would like to see the March 15<sup>th</sup> date changed to June 1<sup>st</sup>. It is not feasible for the District to develop an accurate Workplan by March 15<sup>th</sup>. In the case of most of the streams that the District surveys annually as part of the Stream Reconnaissance and Assessment water levels are too high to allow for District staff to safely conduct the necessary stream surveys and data collection required to develop a Workplan. If the District is required to submit a Work Plan prior to the completion of the necessary stream surveys, the Workplan would not sufficiently outline all of the Stream Maintenance projects that may need to be completed in any given year, or provide the permit-required information to justify the proposed work.

If the SFBRWQCB agrees to allow the District to submit the annual Workplan by June 1<sup>st</sup>, the District would schedule the requested annual field tour of projects by June 15<sup>th</sup> and project implementation would be initiated no sooner than July 1<sup>st</sup> or upon approval from the SFBRWQCB, as appropriate based on the terms of the WDR as written. The District feels that this timeline is most appropriate for the hydrologic conditions in Napa.

Thank you for taking the time to consider the Districts comment and we look forward to continuing to collaborate with the SFBRWQCB to protect and enhance natural resources while reducing flood risk.

Sincerely,



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