



## NAPA COUNTY FARM BUREAU

811 Jefferson Street Napa, California 94559 Telephone 707-224-5403 Fax 707-224-7836

October 17, 2008

Mike Napolitano, Environmental Scientist  
San Francisco Bay Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

RE: Comments on Napa River Sediment Total Maximum Daily Load (TMDL) Revisions

Dear Mr. Napolitano,

On behalf of Napa County Farm Bureau, we thank you for the opportunity to comment on the September 2008 revisions to the Napa River Sediment TMDL and draft amendments to the Basin Plan amendment. We very much appreciate your community outreach and briefing on these changes and acknowledge your excellent work in keeping us well informed about the TMDL public process.

For many years, we have worked with the San Francisco Regional Water Quality Control Board and followed the TMDL process of assessing the sediment problem and determining appropriate targets and implementation measures to reduce erosion and improve the health of the watershed. Within the framework of balancing beneficial uses, we support conservation and restoration efforts to improve native fish habitat for the steelhead and Chinook salmon populations and indeed are already working on such efforts with many volunteer programs and implementation of agricultural Best Management Practices.

As noted in our comment letter of August 11, 2006, we seek further clarity on the implementation measures and the specifics of the Waste Discharge Requirements (WDR) waiver policy. What will the waivers entail? Who will be responsible for identifying and notifying all the affected landowners? Who will oversee the administration of these WDRs? Coordinating the information flow to over 1700 grapegrowers and ranchers will be an enormous effort. We encourage the Board to allow enough time to thoughtfully develop a reasonable and comprehensive program which will achieve sediment reductions without creating bureaucratic confusion and undue burdens for landowners.

We appreciate your ongoing efforts and look forward to working with the RWQCB staff throughout the remaining TMDL and Basin Plan amendment process. Again, thank you for the opportunity to comment.

Sincerely,

Handwritten signature of Peter Nissen in black ink.

Peter Nissen  
President

Handwritten signature of Jim Lincoln in black ink.

Jim Lincoln  
Natural Resources Chairperson