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October 15, 2008

Mr. Mike Napolitano
Regional Water Quality Control Board, San Francisco Bay Region
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Oakland, CA 94612
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**Re: Comments on Establishing a Total Maximum Daily Load (TMDL) for
Sediment in Napa River and an Implementation Plan to Achieve the TMDL
and Related Habitat Enhancement Objectives**

Dear Mr. Napolitano:

The California Department of Transportation (Caltrans) appreciates the opportunity to comment on the staff report and proposed Basin Plan Amendment (BPA) for the Napa River Sediment Total Maximum Daily Load (TMDL). Caltrans strongly supports efforts to protect human health and achieve the best water quality possible. In addition, Caltrans has been proactive and committed to meeting TMDL goals within the San Francisco Bay Region. Caltrans is currently implementing numerous compliance measures discussed in the staff report. However, we have the following concerns with the TMDL documentation:

Caltrans Contribution

Table 2 of the BPA shows the annual sediment delivery to the Napa River from several sources. One of the major contributor categories is "Road-related sediment delivery (all processes)". It is our understanding that this pertains to mostly unpaved rural roads, and thus Caltrans is not a contributor. A separate category is "Urban Stormwater Runoff," which Caltrans falls under, based on values presented in Table 3b of the BPA. Later, Caltrans is addressed as part of the group contributing to urban storm water runoff (Table 4.4 of the BPA) and also as an owner of "Roads" as part of the *Parks and Open Space and Public Works* landowner type.

In summary, the BPA leads us to believe that the road-related sediment category referred to in Table 2 pertains to mostly unpaved rural roads and not to Caltrans; however, this should be clarified in the document.

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TMDL Compliance Schedule

We encourage the Regional Board Staff to coordinate the compliance schedule for this TMDL to be compatible with the timing of other upcoming TMDLs in the region. This would help Caltrans, as well as other dischargers, with effective planning of resources and implementation of controls to meet the requirements of both TMDLs.

We strongly support the goals of the Napa River Sediment TMDL Staff Report and BPA. Thank you for the opportunity to voice our concerns on this topic. If you have any questions, please contact me at 916-653-2512, or Jagjiwan Grewal of my office at (916) 653-2115.

Sincerely,



JOYCE BRENNER
Office Chief
Stormwater Implementation

c: Jagjiwan Grewal
Department of Transportation, Headquarters, Division of Environmental Analysis
Hardeep Takhar
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