

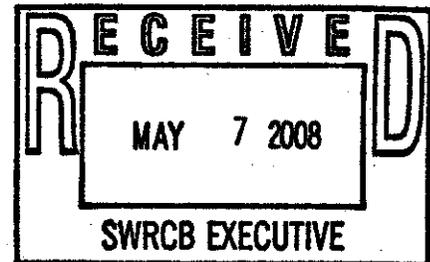
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May 07, 2008

Ms. Jeanine Townsend
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State Water Resources Control Board
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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 Ms. Townsend:

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

Department Contribution

Table 2 of the proposed 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 the Department is not a contributor. A separate category is "Urban Stormwater Runoff," which the Department falls under based on values presented in Table 3b of the BPA. Later, the Department is addressed as part of the group contributing 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 the Department; however, this should be clarified in the document.

Ms. Jeanine Townsend
May 7, 2008
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Implementation Measures

The Department would like to have clarification for the requirements discussed in Table 4.4 of the BPA, which lists performance standards and actions. The sediment load from the Department is expected to be below the performance standard of 500 cubic yards of sediment per road mile over a 20-year period, as specified in the table. In addition, as shown in Table 3b of the BPA, the waste load allocation established for the Department is equal to the estimated current condition discharge load. The Table states that a reduction of zero percent is required from the current Department load.

Under the actions column of Table 4.4 of the BPA, the table includes the requirement to submit a report of waste discharge and the adoption and implementation of best management practices for maintenance of roads to reduce road-related erosion and protect stream-riparian habitat conditions.

We request that the Board please clarify if any additional actions will be needed to achieve Performance standards in addition to compliance with statewide NPDES Permit. The Department implements compliance measures to minimize erosion and Department roadways are landscaped and well maintained.

TMDL Compliance Schedule

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

Thank you for the opportunity to comment. The Department strongly supports the goals of the Sediment TMDL for the Napa River Watershed surface waters, and we hope that our concerns will be addressed. If you have any questions, please contact Jagjiwan Grewal of my office at (916) 653-2115.

Sincerely,



JOYCE BRENNER
Acting Office Chief
Stormwater Program Implementation