



COUNTY *of* NAPA

ROBERT J. PETERSON, P.E.
Director of Public Works
County Surveyor-County-Engineer
Road Commissioner

RECEIVED

DONALD G. RIDENHOUR, P.E.
Assistant Director of Public Works

SEP 01 2005

September 1, 2005

NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT.

Jeff Sharp, Planner III
Conservation Development and Planning Department

RE: TMDL Report Comments


Dear Mr. Sharp:

The Public Works Department has reviewed the draft Napa River Sediment Total Maximum Daily Load Technical Report (TMDL) dated June 28, 2005. Public Works commented on earlier TMDL presentation materials and we are adding to and updating those comments with this correspondence. The Public Works Department continues to be concerned with the TMDL Report prepared by the RWQCB. Our concerns are specifically those areas where Public Works has responsibility including public roads and other County owned and maintained facilities such as culverts, ditches and stream crossings. While the goals and desired improvements to water quality are laudable, it is difficult to fully understand the impacts to the County's road maintenance activities.

The draft TMDL Technical Report has been modified to eliminate goals identified in earlier presentations. The current draft identifies a need for a 60% reduction in sediment runoff from both private and public roads in the Napa River watershed and recommends adoption of a road maintenance manual for County roadways similar to a manual adopted by neighboring counties. These goals and recommendations sound appropriate but it is important for the Public Works Department and Napa County to understand the full impact of these goals and changes in the way we maintain our roads and drainage facilities. The report discusses an approach to reducing sediment on private dirt and gravel roads to maximize the sediment reduction with minimum funds but again the details of these recommendations need to be fully understood. What will the costs of administering a private road improvement program be and how will the improvements and management of this program be paid for? This will be an additional financial burden on private property owners and has the potential to add financial impacts to the Public Works Department for management of a private infrastructure improvement program. Grants and other sources of funds have been identified as possible revenue sources for the programs recommended in the TMDL Technical Report but the details of the financial impact to the County to implement the suggested sediment reduction program is needed. Possibly commitment could be made with the condition that costs are paid for in part or entirely through grant funding to ensure these programs do not become an unfunded mandate.

The Public Works Department must reiterate its concern with the TMDL Technical Report and its goals and recommendations. Additional information and examples of programs and improvements necessary to reduce sediment runoff by 60% from public and private roads are needed to fully understand what this TMDL Technical Report means to the Napa County community. Funding sources need to be specific and real to ensure this does not become an additional burden to maintaining the public road system. The identified funding shortfall over the next 25 years for County roadway maintenance is approximately \$7.3 million per year above our current funding levels of \$5.1 million per year. Additional financial burdens on the road system will result in roadway surface deterioration, lack of funds for safety projects, reduced funding for roadway drainage improvements, and a reduction in funding for emergency response and repairs due to mudslides, accidents, flooding, and storm damage. Thank you for incorporating these comments into a consolidated response to the RWQCB on behalf of the Public Works Department. Please contact me if you have any questions or need clarification of the concerns identified in the letter.

Very Truly Yours,

A handwritten signature in blue ink, appearing to read "Donald G. Ridenhour", is written over a light blue horizontal line.

Donald G. Ridenhour, P.E.
Assistant Director of Public Works

cc: Robert Peterson, Public Works Director
Hilary Gitelman, Planning Director
Patrick Lowe, Deputy Planning Director