

JEFF



COUNTY of NAPA

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

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

July 28, 2006

RECEIVED

Jeff Sharp, Planner III
Conservation Development and Planning Department

JUL 31 2006

NAPA CO. CONSERVATION
DEVELOPMENT & PLANNING DEPT.

RE: TMDL Comments

Dear Mr. Sharp:

The Public Works Department has reviewed the materials provided as part of the presentation made by the State Regional Water Quality Control Board (RWQCB) on the July 27th and July 28th both in Yountville and to the WIC Board. My comments or requests for clarification in the Proposed Basin Plan Amendment are as follows:

- **Roads:** Table 4.4 identifies actions including the submittal of a Report of Waste Discharge to the Water Board that provides at a minimum a description of the property and an identification of site specific erosion control measures to achieve performance standards. I am unclear how the County will provide site-specific erosion control measures for 125 miles of public roads identified to be in the watershed. This action is unclear and it is difficult to understand the economic impact of this recommended action. Napa County roads are far from being adequately funded in normal years. In 2006 we were required to borrow funds from the County General Fund to make road repairs due to storm damage. Much funding was promised from State and Federal agencies for these repairs and now we are forced to appeal the claims for millions of dollars in work that have been denied funding. Any additional burden to the Roads budget will be difficult and to suggest that our future maintenance and storm damage costs will be significantly less due to the recommended actions and work in the TMDL study is inaccurate. The most costly storm damage locations were due to landslides where hillsides were unstable due to the saturated soil conditions and not caused by poor maintenance activities and undersized or poorly designed culverts. Napa County is concerned about the RWQCB staff report and their presentation where they suggest that grants will be a viable source of funding for these projects.
- **Fish Passage:** Table 5.3 identifies Action 3.3 that recommends identification and remedy of all significant structural impediments to fish in the Napa River and the ten key tributaries. No financial impacts were identified in the staff report for this recommendation so it is difficult to determine the financial impact this will have on the County and other private and public entities. Replacement of bridges, culverts, and

stream crossings are significant projects and will require extensive designs, permitting, and administration, which will be a financial burden to the responsible party. Napa County is concerned about the RWQCB staff report and their presentation where they suggest that grants will be a viable source of funding for these projects.

- **Enhance Stream Baseflow:** Table 5.2 identifies several actions regarding reservoir bypass flows to maintain suitable conditions for fish. It was noted in the Table there was an error listing Napa County as an implementing party to conduct water rights compliance surveys. It should be noted that Action 2.2 to “Adopt a plan for joint resolution of water supply reliability and fisheries conservation concerns” are in direct conflict with one another. The owners of reservoirs in Napa County can only see their water supplies for their municipal needs reduced if they are required to release more water to streams during the dry season. To suggest a mutual solution could solve both without the construction of significant water supply project is misleading. The financial impacts of this could be in the tens of millions of dollars depending on the quantity of water released into streams.

The Public Works Department has significant concerns with the TMDL study and the recommendations and goals included in the technical report. It is difficult to fully grasp what will be required of the Public Works Department and what the financial impact of the recommendations in the TMDL study will be. At the very least, additional staff resources will be required to manage the many programs recommended. 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,



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