



SVBC is a 501(c)(3) non profit organization with the mission of promoting the bicycle for everyday use.

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MRP Tentative Order Comments

Attn: Dale Bowyer
S.F. Bay Water Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

February 28, 2008

Via Email to mrp@waterboards.ca.gov

Subject: Comments on the MRP TENTATIVE ORDER R2-2008-XXXX

Dear Mr. Bowyer:

The Silicon Valley Bicycle Coalition is concerned that the Tentative Order unreasonably places newly constructed trails in the same category as New Road Projects (Section C.3.b.i(4)). Although we are supportive of the need to control run-off pollution into our waterways, we feel that, without further clarification, this order could unduly burden trail construction with unnecessary mitigation.

Trails designed to be used by bicyclists and pedestrians will not accumulate the same level of pollutants as roads used by motorized vehicular traffic. In fact, by allowing people to walk or bike to their destinations, trails should, to some extent, reduce the use of motor vehicles and their concomitant emissions.

Trails are often planned within 50 feet of streams, and thus would fall under the proposed regulation. In addition, they are generally constructed of impermeable materials. If there is a requirement to construct trails of permeable materials, this will increase costs, and will almost certainly result in fewer miles of trails being built. The section C.3.e *Alternative Compliance with Provisions C.3.b. and d.* appears not to apply to trails as written.

The Silicon Valley Bicycle Coalition is dedicated to increasing bicycle use in Santa Clara and San Mateo County. Trails are a key component of the bicycle network, and we strongly support the development of a robust trail network. We ask you to specifically address the trails issue, and to clarify the extent to which trails will be subject to waste discharge requirements. We look forward to working with the California Regional Water Quality Control Board, and other concerned parties to further our mutual interest in preserving and enhancing the environment of the San Francisco Bay Region.

Sincerely,

Corinne Winter
Executive Director