

For attention of: Dale Bowyer.

I have a comment on the MRP Tentative Order.

While I agree that runoff water from areas that are likely to contain contaminants, such as city streets and parking lots, due to the vehicles that discharge fluids and solids that should not end up in our creeks and lakes, I see a problem with the proposed text to regulate non-impervious surfaces for all solid surface roads and parking lots and that is that it also applies to trails which are exclusively used for non-motorized transportation and recreational use.

Requiring these trails to switch to non-impervious surface material will significantly raise the cost of these trails, while there is no problem that needs to be mitigated on trails - there are no cooling fluids, oils, brake dust and other unwanted substances that originate on a trail, so the requirement that trails also must use non-impervious material will lead to the construction of fewer trails (fixed budget and higher cost per trail makes a lower nr of trails) while at the same time there is no benefit from the use of non-impervious surface material on trails or the benefits can be reached in less costly ways to contain runoff water.

Since the reduction in the number of trails that can be constructed and the problem of rising cost for maintenance of the existing trails puts a large burden on our communities (where to go for healthy exercise, for a Sunday afternoon stroll or for a non-motorized bicycle commute to work, to name a few) and the benefits of the use of non-impervious material for trails seems insignificant, I urge you to exclude trails from the proposed order to use non-impervious material for all solid surfaces.

Kind regards,
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