

commentletters - Comments to the General Construction Permit

From: "Lund, Bruce" <blund@parks.ca.gov>
To: <commentletters@waterboards.ca.gov>
Date: Monday, June 15, 2009 8:05 AM
Subject: Comments to the General Construction Permit
CC: "LeFlore, Rick" <rlefl@parks.ca.gov>, "Jenkins, Phil" <PJENKINS@parks.ca.gov>,
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For consideration of the SWQCB,

Numeric limits for rural and generally undeveloped landscapes that are part of a Parks and Recreation setting should have General Development Permit numerical effluent requirements held to background water quality (local site run-on by constituent) plus a reasonable allowance for temporary ground disturbance prior to final stabilization. Please consider trail building, major maintenance or retro fit as unique.

Trail system projects can easily exceed one acre do to their linear nature, can be close to watercourses and other points of public interest and can have a fairly long period before they fully stabilize. As an example; having to maintain a two mile linear BMPs with absolute numeric limits for one or two rainy seasons before that trail segment fully integrates into the local environment is impractical, largely un-doable, and will kill the development or major re-fit of trail systems on park lands.

The costs associated with complex linear systems of BMPs along these publically beneficial facilities will preclude construction of many trails often built with volunteers, the CCC or inmates. The result is that newly acquired park lands will not see reasonable development or use in the foreseeable future. As the State's population increases, the lands and trails needed to absorb the public outdoors will not keep pace which will put further strain on older less well designed trails that are erosion and sediment producers feeding a downward spiral in water quality while we all want a better outcome.

In order to keep improving back country linear facilities, I suggest a special section of the new regulations and permit requirements for linear features designed for beneficial public use. The numeric limitations for water quality should be tied to a tapered numeric limit. One that starts at say 500 NTU over background (at trail/watercourse intersection monitoring points) for season one, and has to get under 100 NTU within five years with required annual inspection at all such points. That way the trail performance gets monitored and reported. The trail gets maintained and improved over time to meet the needs and requirements of the intent of the CWA, et all.

It is my firm belief that Public Trail Systems (PTS) must be considered differently than other forms of general development or construction.

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