

# TODD ENGINEERS

GROUNDWATER · WATER RESOURCES · HYDROGEOLOGY · ENVIRONMENTAL ENGINEERING

September 8, 2011

Ms. Christine Sotelo  
State Water Resources Control Board  
1001 I Street  
Sacramento, CA 95814  
**Via e-mail: [csotelo2waterboards.ca.gov](mailto:csotelo2waterboards.ca.gov)**



**Subject: Comments on 2011 Draft Phase II Small MS4 General Permit**

Dear Ms. Sotelo:

Todd Engineers is a small consulting firm specializing in hydrology, watershed evaluations, and groundwater-surface water quality. Our staff has also had experience in mineral exploration, mine evaluation, and mine litigation support issues.

138.1 → I attended the August 17, 2011 Public Workshop and on August 25<sup>th</sup>, I discussed the issues of compliance difficulties with Mr. Bruce Lund of State Parks and Recreation. These were:

- Problems associated with water quality associated with abandoned mine discharges including acid mine drainage (AMD)
- Historic sites protected by law that must meet runoff standards
- R.L. Stevenson State Park which includes the Silverado Mine
- The Corral Hollow Creek OHV Park that has problems with extreme bed load that is impacting bridge and creek realignments
- The Clay Pit OHV Park in Oroville
- Malikoff Diggins State Park which has historical protection

Todd engineers believes that a watershed management approach may be a good way to monitor stormwater discharge considering that there are multiple property ownerships in many of the State Parks including in-holdings such as oil and gas wells, abandoned mines, and former processing plants (mills).

Todd Engineers is interested in becoming more involved and could provide expert consulting services for the process.

Sincerely:

**Todd Engineers**

Handwritten signature in blue ink that reads "RK Will".

Raymond K. Will, PE  
Principal Engineer

cc: Mr. Bruce Lund