



California Sportfishing Protection Alliance

"An Advocate for Fisheries, Habitat and Water Quality"

3536 Rainier Avenue, Stockton, CA 95204

T: 209-464-5067, F: 209-464-1028, E: deltakeep@aol.com, W: www.calsport.org

23 March 2009

Ms. Wendy S. Wyels, Chief, Compliance and Enforcement Section

Ms. Sue McConnell, Senior WRCE

Regional Water Quality Control Board

Central Valley Region

11020 Sun Center Drive, Suite 200

Rancho Cordova, CA 95670-6144

VIA: Electronic Submission

Hardcopy if Requested

RE: Draft Cleanup and Abatement Order for El Dorado County Department of
Transportation, Rubicon Trail, El Dorado County

Dear Mesdames Wyels and McConnell:

The California Sportfishing Protection Alliance (CSPA) submits the following supplemental comments on the Draft Cleanup and Abatement Order, El Dorado County Department of Transportation Rubicon Trail, El Dorado County. These comments are in addition to the extended comments CSPA submitted on the proposed order on 2 February 2009.

The activities described in the Staff Report and proposed Cleanup and Abatement Order for the Rubicon Trail show that the current trail use creates a potential to cause exceedance of water quality objectives for bacteria (fecal coliform organisms), sediment, settleable material, suspended material and turbidity. This potential threatens the receiving water beneficial uses of Municipal and Domestic Supply, Agricultural Supply, Water Contact Recreation, Warm and Cold Water Habitat, Wildlife Habitat, Spawning and Migration of Aquatic Organisms. Riparian water use may include drinking and domestic and irrigation of food crop gardens. Contact recreational activities are well documented in the area. The local streams are also designated for warm and cold-water aquatic life.

The Cleanup and Abatement Order includes several requirements to improve the environment along the trail including methods to reduce fecal matter, sediment flows. It seems reasonable to conclude that the worst water quality impacts will likely be observed after sufficient rainfall has occurred to cause runoff, especially at the start of the rainy season and during snow melt. Such events should be the central focus of the sampling. We strongly recommend that a Monitoring and Reporting Program (MRP) be adopted along with the proposed Cleanup and Abatement Order. A MRP would allow the Board to determine compliance with water quality objectives, the condition of receiving water beneficial uses and the effectiveness of measures implemented to correct documented problems. The required monitoring should include sample and analysis for the above cited parameters and observations of instream sediment accumulations, aquatic life, wildlife, whether runoff is occurring and its clarity. The MRP should require that state and local

health departments be notified of any exceedance of bacteria criteria for advice regarding posting and public notification.

Thank you for considering these additional comments. If you have questions or require clarification, please don't hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Jennings". The signature is written in a cursive style with a large initial "B".

Bill Jennings, Executive Director
California Sportfishing Protection Alliance