

(received via e-mail)

**From:** Bruce Brazil  
**To:** <smcconnell@waterboards.ca.gov>  
**Date:** 3/15/2009 3:20 PM  
**Subject:** Rubicon Trail Draft Cleanup and Abatement order

Sue McConnell  
Central Valley Water Board

Dear Ms. McConnell

I am submitting a comment on the Rubicon Trail Draft Cleanup and Abatement order. Within the order, are references to the Ziegler study done in Thailand.

The potential sedimentation values stated in the order are based on false assumptions. Actual sedimentation readings were not taken. Instead, the only real data taken was the surface area of the trail and depth of loose material. Rainfall rates were not taken into account or the FACT that snow covers the Rubicon Trail during much of the wet weather season.

The methodology of the Ziegler study does not conform to the realities of the rainfall and snowfall that takes place on the Rubicon Trail. In the Ziegler study, a rainfall at the rate of 90-120 mm per HOUR was used. That's 3.5"-4.7" PER HOUR. Rainfall at this elevated rate does not take place on the Rubicon Trail. Snow covered land will not have the same water sheeting as the non-snow covered area in Thailand.

Documentation on the Ziegler study can be found here:

<http://webdata.soc.hawaii.edu/hydrology/vita/papers/se21c.pdf>

Look at page page 2, Methods, Rainfall Simulation Experiments

Therefore, please do not use that study as a means of determining the amount of siltation created by rainfall.

Thank you for taking the time to consider my comment.

Bruce Brazil