



CALIFORNIA TROUT

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Via Email

March 31, 2009

Sue McConnell
Central Valley Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6144

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

Dear Ms. McConnell and SWRCB Board:

California Trout has reviewed the proposed *The Draft Cleanup and Abatement Order for El Dorado County Department of Transportation, Rubicon Trail* and submits the following comments for the record.

California Trout is a 501(3)(c) non-profit conservation organization that was established in 1971. California Trout's mission is to protect and restore wild trout and steelhead waters across California. Based in San Francisco, our core conservation strategy is the establishment of regional offices with expert staff in key watersheds around the state. This January, CalTrout opened a Northern Sierra Regional Office in South Lake Tahoe, CA to build our presence in this ecologically-important region and to expand and coordinate our successful regional efforts statewide.

California Trout has been recognized as one of the strongest and most effective conservation organizations in California. Our list of victories with key partners – from re-watering Mono Lake and protecting nearly the entire course of the Smith River to helping to establish the California Wild and Scenic Rivers Act – exemplify how California Trout effectively *leverages the fish* to protect water for people, the environment, and our economy.

California Trout is writing in **support** of the Central Valley Regional Water Quality Control Board Draft Cleanup and Abatement Order. California Trout supports this effort due to the substantial impacts of the Rubicon Trail to wild and native trout in the Middle Fork of the American River Drainage. The proposed restoration and mitigation activities will, in the long-run, enhance the survival and spawning potential for native and wild fish within the project site.

In addition to the minimum requirements of the Draft Cleanup and Abatement Order the Central Water Valley Water Quality Board has issued, California Trout recommends the following amendments to consider in finalizing the plan:

- 1) Mandatory Wet Seasonal Closure on the Rubicon Trail should be consistent with the Eldorado National Forest Travel Management Plan for native surface roads.**
- 2) Cleanup of sediments in Ellis and Gerle Creeks, Little Rubicon and Rubicon Rivers.**
- 3) Cleanup of oil spills, crank cases and human waste along the entire extent of the Rubicon Trail.**
- 4) Set a carrying capacity for the Rubicon Trail with strict use quotas and user fees**

In researching this proposal we spoke with Amy Greene with Placer County Public Works Department. The Placer County Public Works Department has developed a positive relationship with the OHV community using the Rubicon Trail in the Lake Tahoe Basin and have, implemented successful erosion control measures. We recommend that you speak with them on developing positive long-term management solutions for El Dorado County Department of Transportation. It is our hope that this Draft Cleanup and Abatement Order will serve as a positive example for other OHV trails.

In conclusion, we want to thank you for the opportunity to provide our comments on this important issue. If you have any questions or require further clarification, please don't hesitate to contact me directly.

Sincerely,



Jenny Marie Francis
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