

**Dale Bowyer - Municipal Regional Permit Tentative Order**

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**From:** Bern Smith <bern\_smith@ridgetrail.org>  
**To:** <mrp@waterboards.ca.gov>  
**Date:** 2/29/2008 1:28 PM  
**Subject:** Municipal Regional Permit Tentative Order

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Dale Bowyer  
SF Bay Water Board  
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29 Feb 2008

I have read the proposed regulations regarding stormwater runoff management in the SF Bay region, and in particular the new regulations concerning paved trails. It would appear from the scope of the new proposed requirements pertaining to impervious surfacing that there would be no option for trail builders but to use pervious pavement. I have posted below the note regarding maintenance of pervious pavement, copied directly from the website of the National Ready Mix Concrete Association:

*"? Maintenance*

*... Maintenance of pervious concrete pavement consists primarily of prevention of clogging of the void structure. In preparing the site prior to construction, drainage of surrounding landscaping should be designed to prevent flow of materials onto pavement surfaces. Soil, rocks, leaves, and other debris may infiltrate the voids and hinder the flow of water, decreasing the utility of the pavement. Landscaping materials such as mulch, sand, and topsoil should not be (text missing in original) concrete, even temporarily.*

*Vacuuming annually or more often may be necessary to remove debris from the surface of the pavements. Other cleaning options may include power blowing and pressure washing. Pressure washing of a clogged pervious concrete pavement has restored 80% to 90% of the permeability in some cases. It also should be noted that maintenance practices for pervious concrete pavements are still being developed."*

Based on these statements from the industry, it appears that pervious pavement may not appreciably improve stormwater management in trail-specific developments, which are by their nature quite low-impact to surrounding natural areas anyway (compared to the other kinds of regulated projects). The typical uses of trails would not appreciably increase the levels of any of the listed contaminants. Vacuuming and/or pressure washing trails (especially pressure washing of trails near streams) seem impractical management tools for most of the typical paved trail projects. In addition, the illustrations accompanying the website text show a material with quite large voids between the particles that make up the pervious surface, suggesting such materials would substantively reduce the performance of the tread for trail users in wheelchairs, or on skates, or pushing strollers, all of which are popular uses of paved trails.

Please take these comments into account when making your final decision regarding implementation of this regulation.

Regards --

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