



# Willow Glen Neighborhood Association

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February 25, 2008

Dale Bowyer  
San Francisco Bay Watershed Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

re: MRP Tentative Order Comments

Dear Mr. Bowyer,

I am writing on behalf of the Willow Glen Neighborhood Association (WGNA), which serves the Willow Glen district in central San Jose. As stated in our bylaws, we “represent [our] members on issues of neighborhood enhancement and preservation. The Association shall focus and take appropriate action on such matters as land use, planning, traffic, safety, open space, parks, and recreation.” As such, we have been actively involved for decades in promoting recreational trails such as the Los Gatos Creek Trail in San Jose, in working on land use policies such as San Jose’s Riparian Corridor Policy, and in implementing environmental enhancements such as our Urban Stream Restoration Project along the Los Gatos (see the report online at [www.wgna.net/arcata.htm](http://www.wgna.net/arcata.htm)).

We have concerns with portions of provision C.3.b.1(4) (“New Road Projects) in the Municipal Regional Stormwater NPDES Permit Tentative Order (online at <http://www.waterboards.ca.gov/sanfranciscobay/mrp/mrp121407/mrptentativeorder121407updated.pdf>.) It appears to require “management techniques” and “stormwater treatment systems” for a number of “New Road Projects”, including “impervious trails that are greater than 10 feet wide or are creek-side (within 50 feet of the top of bank).”

While the overall intent of the policy is laudable, the clause on trails is counterproductive:

- Streamside trails such as the Los Gatos Creek Trail often need to be at least 12' wide to handle all the users: if the trail is narrower, then joggers and dirt-bikers tend to wander off-trail, creating parallel paths that erode and contribute to sedimentation.
- The trail needs to be paved, as the trail serves a wide variety of users: joggers and bicyclists, but also rollerbladers, skateboarders, wheel-chairs and walkers, and baby-carriages, none of which would be able to utilize a gravel trail.
- Requiring a stormwater treatment system for a recreational trail is unneeded: joggers, bikers, and the rest are not spewing unburned hydrocarbons or dripping motor oils as they travel down the trail.

- A stormwater treatment system would be prohibitively expensive as well, and so the City would not be able to afford the completion of the trail: people then would be constrained to continue always using their cars to get around, which does create pollution.

Please remove the clause in C.3.b.1(4) in the policy update so that the City will be able to complete our regional trail system.

Thank you,

Dr. Lawrence Lowell Ames, WGNA President

cc: Yves Zsutty, City of San Jose Trails Coordinator  
Lisa Killough, Director, Santa Clara County Dept. of Parks & Recreation  
Don Hebard, Chair, Los Gatos Creek Streamside Park Committee  
Martin Delson, Willow Glen trails advocate.