



Siskiyou Gardens, Parks and Greenway Association
P.O. Box 36, Yreka, CA 96097

Providing for the health and well-being of our community by promoting the conservation and public use of open space in Siskiyou County

July 23, 2012

Jeannine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

Dear Ms. Townsend and Members of the State Water Resources Control Board:

Thank you for the opportunity to state our interests concerning the proposed MS4-General Permit requirements. The Siskiyou Gardens, Parks and Greenway Association is a small non-profit citizens group committed to the conservation of open space and natural resources within beautiful Siskiyou County, California. Through our many programs (Yreka Creek Greenway, Siskiyou Arboretum, Yreka Community Garden, Children's Garden and Friends of Greenhorn Park) we actively improve and conserve healthy ecosystem conditions with a focus on restoration of local riparian, floodplain and recreation habitats, especially those of anadromous fish. Our activities have resulted in the integration of anadromous fish habitat goals within the City of Yreka's General Plan as well a growing legacy of effective stream and floodplain restoration projects for more than 20 years. Progress will continue in the coming years if supported by SWRCB conservation policies that apply requirements tuned to maximize the capacity of each community. Please refer to City of Yreka's Permit comment letter and its Exhibit A which summarizes some of our many stream conservation accomplishments which we hope to continue into the future. Since our small group lacks paid staff or legal counsel, our comments below focus on basic functionality of the Permit as applied to our local anadromous fish populations, and the need for support rather than difficulty for those addressing the problem through effective restoration projects and conservation approaches.

We are concerned that the proposed Permit requirements as stated would inappropriately subject the Yreka community's very few committed city staff and citizens to numerous disproportional and counterproductive administrative requirements. Human capacity is always a critical limiting factor; this is especially so in small and economically disadvantaged communities such as Yreka. Additional requirements upon our community's limited human and financial capacity could easily prevent rather than support significant ongoing stream conservation progress.

We believe that the SWRCB shares our concern and urgency to achieve effective habitat restoration for declining anadromous fish populations. Within the Shasta River system, of which Yreka Creek is a part, two of the three brood years of Coho Salmon no longer exist, leaving one brood year left to potentially recover the species. For this reason alone, we are hopeful that immediate and effective accommodations will be made in the Permit requirements so that habitat restoration will occur in the waters of rivers and streams rather than in documents prepared to meet the requirements. Without these accommodations, it will be difficult if not impossible to continue essential aquatic habitat restorations within small, limited-capacity communities such as ours. We highly recommend a localized and adaptable Permit implementation approach. This approach would foster direct teamwork and engagement of SWRCB representatives, local agency staff and citizens working together to achieve the serious purposes of quickly providing improvements in the water to meet the goals we all support.

We invite you to visit and view our recently completed projects that demonstrate consistency with the purposes of the Permit's goals.

Sincerely,

Siskiyou Gardens Parks and Greenway Association

By:

Margaret J. Boland, President

A handwritten signature in blue ink that reads "Margaret J. Boland". The signature is written in a cursive style and is positioned above the printed name "Margaret J. Boland, President".