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COUNTY OF SISKIYOU

COUNTY ADMINISTRATIVE OFFICE

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August 18, 2016

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

Comment Letter # 29



Subject: Preliminary Draft for Procedures for Discharges of Dredged or Fill Material to Waters of the State

Dear Ms. Townsend:

The County of Siskiyou provides the following comments on the *Preliminary Draft for Procedures for Discharges of Dredged or Fill Material to Waters of the State* (Preliminary Draft). First, we request that the comment period for this Preliminary Draft be extended so that commenters can provide thoughtful and thorough review on a document that could have large and lasting consequences on various activities performed throughout the State of California. The County of Siskiyou requires additional time to determine what impacts this Preliminary Draft document will have on activities performed within the Siskiyou County itself.

29.1

It appears that the Preliminary Draft duplicates efforts already in place by other agencies such as the U.S. Army Corp of Engineers and the U.S. Environmental Protection Agency, who already issue Section 404 permits under the Clean Water Act. Duplication and redundancy heavily impacts an already burdened and regulated community and increases unnecessary efforts for the public. Additionally, the Preliminary Draft replicates efforts by the California Department of Fish and Wildlife who perform similar work through their streambed alteration agreement process. Requiring more permitting and burdening applicants with additional work and cost which is already covered by other processes puts huge strain on privately owned small businesses and citizens within California. Not to mention that duplicating efforts yields no productive or positive outcomes and only causes more delays and cost.

29.2

Expanding jurisdictional boundaries and definitions for "wetlands" and "waters of the state" will have real impacts to landowners and citizens. These new proposed rules will impact canals, constructed waterways, non-vegetated areas, and others which have not historically been identified as "wetlands" or "waters of the state" (and have been covered under exemptions), and have no support to be deemed with these terms. Implementation of these terms and rules will impact daily operation and maintenance activities performed by landowners, farmers, ranchers, small privately owned construction companies, and others.

29.3

Please keep the County of Siskiyou up to date on the proposed document as we intend to stay engaged throughout the process and provide additional comments. For further communication and correspondence please contact Elizabeth Nielsen, Siskiyou County Natural Resource Policy Specialist at 530-842-8012, or by email at enielsen@co.siskiyou.ca.us.

Sincerely,

A handwritten signature in cursive script that reads "Elizabeth Nielsen".

Elizabeth Nielsen
Natural Resource Policy Specialist