



## SISKIYOU RESOURCE CONSERVATION DISTRICT

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May 10, 2006

Attn: Song Her, Clerk to the Board  
State Water Resources Control Board  
P.O. Box 100  
Sacramento, CA 95812 0100

RE: Comment Letter - Sediment and Temperature TMDL in Scott River Watershed

Dear Board Members;

Per the State Water Resource Control Board's request, we will not repeat the points made in our April 10, 2006 demonstrating the successful history of collaboration and volunteer actions in Scott Valley.

### **Scott River Community Groundwater Measuring Program**

Both the County of Siskiyou and the Scott River Watershed Council will separately provide you with further information regarding the Scott River Community Groundwater Measuring Program, which is a collaborative effort between the Scott River Watershed Council, Natural Resource Conservation Service (NRCS), U.C. Cooperative Extension- Davis, Siskiyou County, and the Siskiyou RCD.

### **Flows**

Mr. Dan O'Hanlon of Kronick, Moskovitz, Tiedemann and Girard, who has been retained by Save Our Shasta and Scott Valleys (SOSS) will address under separate cover certain legal and regulatory issues as they may relate to flows and water rights in the Scott River watershed.

Flows in the Scott River are highly seasonal. For 60 years USGS has maintained a gauge on the Scott River as it leaves Scott Valley just before it enters the canyon. This data shows that flows peak at an average of 1,100 cfs (daily ave) in the month of May, decline to an average of 250 cfs during the first half of July and are only 61 cfs in August, 52 cfs in September and 86 cfs the first half of October. This compares with flows of approximately 800 - 1000 cfs in the mainstem Klamath during this period.

With these minimal average flows in August, September and the first half of October, the Scott River is unable to have any significant effect on temperatures in the mainstem Klamath during this critical period of the salmon spawning season.

**Timelines**

We remain convinced that the TMDL Action Plan language proposed by the North Coast Regional Water Quality Control Board provides the best basis to move forward. The lack of information in many key areas makes more specific timelines problematic at this time. The process laid out in the Action Plan approved by the Regional Board provides for frequent reviews by the Regional Board to assess progress being made. Importantly the Regional Board has made it very clear in both the Action Plan and the supporting staff report that all regulatory and enforcement measures remain available to the Regional Board to utilize should adequate progress not be made.

We believe the language in the Scott Valley Watershed TMDL Action Plan should remain as approved by the Regional Board on December 7, 2005.

Sincerely yours,

William P. Krum  
President