

ALDER SPRINGS RANCH & VINEYARD

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STATE WATER RESOURCES
CONTROL BOARD
2006 AUG 31 AM 11:38
DIV. OF WATER RIGHTS
SACRAMENTO

July 31, 2006

Mr. Eric Oppenheimer
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812

RE: North Coast Instream Flow Policy Substitute Environment Document

Dear Mr. Oppenheimer:

I wanted to write to you regarding the instream flow policy document that you are preparing. I have large properties in Mendocino County on the north fork of the Eel, on the main branch of the Eel and on the Garcia River. I hold a number of permits for ponds, etc., and have many small year round streams that run on my ranches.

Keeping instream flows during summer and early fall is a big challenge. Every one needs water and streams are the easiest place to get it. Also, riparian rights are simple and straightforward. There is just enough water in most small coastal streams in late summer to just keep the fish alive without every human being putting a pump or a dam in the creek.

Storage into stock ponds or storage ponds has a number of advantages: Ponds can be filled during the winter months when stream flows are high (often very high), they are very good for wildlife, and a great deal of water can be stored so that water doesn't need to be taken from the streams in the summer. These ponds, in my view, have very few disadvantages and many things to recommend them, yet they are very hard to get permits for. (Years of applications and red tape.)

In our area, a great number of parcel owners put a pump in the creek for domestic use and yard irrigation. This is not much of a problem most of the year but can dry up a stream in late summer when water demand is the highest and supply the lowest.

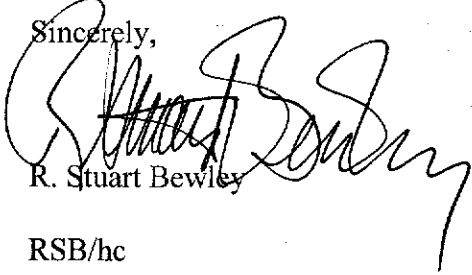
Many of these parcel owners don't want to invest the money (about \$10,000.00) to dig a 200-250 foot deep well. Wells would take a great strain off the coastal streams but only when there is an incentive to dig wells will this happen. For example: 50% grant for digging a well, \$500.00 annual riparian fee for every landowner who pumps directly from a stream.

Many streams on our ranches run year round only to be as dry as a bone two or three property owners down stream with each having pump in the creek. Most of these have no permits or filed rights.

I encourage you and your staff to walk a few of these streams before you write your reports and recommendations. It is easy to see in many cases why our fish are having such a tough time.

In your solution please try not to just add more paperwork and red tape. Take some away in an area that is beneficial such as ponds. It's the fees, red tape, and hassle that keeps people from doing things, or they just do them without permits.

Sincerely,



R. Stuart Bewley

RSB/hc