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August 25, 2006

Eric Oppenheimer
State Water Resources Control Board
Division of Water Rights
P.O. Box 2000
Sacramento, CA 95812-2000

Subject: Comments to Notice of Preparation

Dear Mr. Oppenheimer:

The purpose of this letter is to provide our comments relative to the Notice of Preparation (Notice) for a Draft Substitute Environmental Document (Draft SED) for the proposed North Coast Instream Flow Policy (Policy). Based on the information contained in the Notice provided by the State Water Resources Control Board, dated July 19, 2006, we are submitting the following are comments for consideration in the Draft SED:

- Address the basis and method to determine the timing and quantity of bypass flows.
- Identify and address the potential effects of the Policy to existing water right holders.
- Relative to the cumulative impacts of diversions, address the basis and method to determine the thresholds that would require additional hydrologic and biological studies.
- Address the appropriate method to identify Points of Interest (POI) and consider the potential impacts relative to selections of POIs based on location both upstream and downstream of confluences.
- Identify the monitoring needs for environmental conditions including, but not limited to fishery resources and habitat, water quality, and stream flow in order to develop additional data for future revisions to the Policy; and identify the responsible government agencies for the monitoring and reporting.

In advance, thank you for consideration of our comments. Please call if you have any questions.

Sincerely,
MBK ENGINEERS

A handwritten signature in black ink, appearing to read "Darren B. Cordova". The signature is written in a cursive style with a large, stylized initial 'D'.

Darren Cordova

DC/pp
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