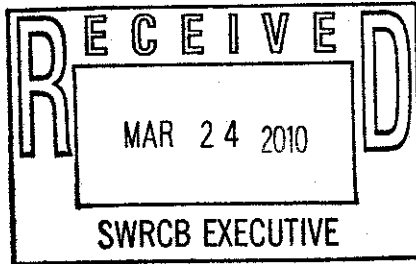


JENSEN /
PTASZYNSKI
ARCHITECTS



4/27/10 Board Hearing
AB 2121
Deadline: 3/26/10 by 12 noon

Andre Ptaszynski AIA

March 24, 2010

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

Re: COMMENT LETTER AB2121 POLICY

Dear Board Members,

As an architect who is involved with the Sea Ranch and Gualala community, I wish to register my opposition to the proposed AB2121 water management policy.

The SWRCB staff-recommended proposed policy, applicable regionally, could have a drastic, negative impact on The Sea Ranch. The proposed policy should be revised to require that the economic impacts on current water users be taken into account. The policy should be evaluated by including burden as well as benefit..

Please consider the following effects on the community:

- The proposed regional policy does not take into account the hydrology of the Gualala River nor the primary threats to fish. The State has designated the Gualala River as impaired because of silt and high temperatures caused by de-vegetation of riparian zones.
- The proposed policy assumes one size fits all. It was not validated for the Gualala River, but instead for inland conditions. The policy has no basis in science applicable specifically to the Gualala River watershed or to the pumping from the aquifer within this watershed.
- The proposed policy would permit The Sea Ranch to present site specific studies as an alternative. The stated guidelines for developing site specific alternatives appear to require studies equivalent to environmental impact studies under the California Environmental Quality Act (CEQA). To have scientific integrity, such studies would cost about \$1 million. Further, there is no provision to take into account impacts on The Sea Ranch, while the criteria remain focused exclusively on fish and instream flow.

I believe the proposed policy should be revised to require that the economic and other impacts to current water users be taken into account. The policy should be evaluated by including burden as well as benefit. Further, the policy should employ science that addresses conditions like those found on the South Fork Gualala River.

Thank you for your consideration of these issues.

Sincerely,

Andre Ptaszynski, AIA