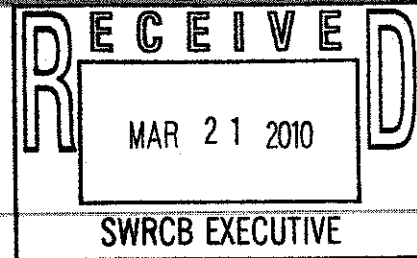


commentletters - SWRCB Proposed Policy

From: Barbara & Jay Kelley <sonomawine@earthlink.net>
To: <commentletters@waterboards.ca.gov>
Date: 3/21/2010 12:26 PM
Subject: SWRCB Proposed Policy



Our community manager recently alerted residents to Assembly Bill 2121 (2004), and the State Water Resources Control Board (SWRCB) proposed policy intended to enhance instream flows in the north coast region, which includes the Gualala River. The local community of Gualala, Anchor Bay, The Sea Ranch have many elderly, disabled, and low income residents who will be negatively impacted by this ill thought proposal. In addition, many community organizations and business will be severely impacted. Restaurants, health centers and medical facilities are some of those who will be negatively impacted, as well all residents and visitors they serve.

Here are some key reasons that this policy needs to be revised:

1. The 'study' that led to this proposal was not validated for the Gualala River, but instead for inland conditions far different than ours.
2. The policy has no basis in science applicable specifically to the Gualala River watershed or to our pumping from the aquifer within this watershed.
3. There is no provision to take into account impacts on Gualala, Anchor Bay, The Sea Ranch, and other local communities while the criteria remain focused exclusively on fish and instream flow.
4. Some local communities have an excellent water conservation program and a very low gallons per capita per day usage.
5. Staff recommendations that led to this proposal appear to take into account what is in the water, but not the needs of humans and wildlife outside the stream and river. The work that led to staff recommendations was very incomplete, with inappropriate and harmful results to the local environment. The State has designated the Gualala River as impaired because of silt and high temperatures caused by de-vegetation of riparian zones. Local residents and businesses will not support a change that will have a negative impact on the River and severe economic impact on local businesses, organizations, and residents.
6. It could leave The Sea Ranch and similar local communities without water supply for days or even months each year. This would be environmentally unsound and unhealthy.

This is what I am requesting you do to correct the most serious problems with this proposed policy:

7. Revise the policy to require that the economic impacts on current water users in this community be taken into account.
8. The policy should be evaluated by including burden as well as benefit to both the water, local water systems, residents and wildlife.
9. Water needed for our local community should not be re-dedicated to instream flow, especially when it is not even needed for that purpose.

The final policy that you adopt should Do No Harm to the local community, local water systems, residents and wildlife.

Thank you,

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