

From: Robert Welch <rwelch@mcn.org>  
To: <commentletters@waterboards.ca.gov>  
CC: Francine Shapiro <francine@mcn.org>  
Date: 3/26/2010 11:44 AM  
Subject: COMMENTS ON AB2121 POLICY

Subject: Comment Letter - AB2121 Policy  
February 2010 Draft North Coast In stream Flow Policy

To Whom It May Concern:

I request that the following comments be made part of the administrative record for the Proposed Policy for Maintaining In stream Flows in Northern California Coastal Streams.

In response to AB2121, the State Water Resources Control Board (SWRCB) staff has recommended a proposed policy would drastically affect The Sea Ranch water supply and would leave The Sea Ranch without water supply for days or even months each year.

Two components of the proposed policy's Regional Criteria are especially onerous, and their economic burdens must be lifted if The Sea Ranch is to remain a viable community.

1. The proposal is to limit the diversion season to December 15 to March 31. For years, The Sea Ranch Water Company has met the water needs of The Sea Ranch under a set of permits allowing the diversion of water from the aquifer underlying the South Fork Gualala River. The wells may operate year-round provided there are specified minimum surface flows bypassed. The Sea Ranch rigorously adheres to those bypass requirements. Typically the flow is adequate for the wells to operate from December until July, although in the 2008-2009 drought, pumping didn't begin until February 2009.

2. The proposed policy will mandate huge volumetric river flows (commonly referred to as bypass flows, or river water flows that go past the well's location) in the Gualala River before we can operate the wells. We estimate that the bypass flows would have to be about 10 times greater than the state's current permitted policy for The Sea Ranch.

The combined effect would be to deprive The Sea Ranch of adequate water supply to sustain the community's viability even in normal rainfall years.

Sea Ranch has always adhered to the motto "live lightly on the land" and this has included water usage. Our record of water conservation is excellent and the actions of the water board are not a fitting reward for our efforts.

We are strongly opposed to the proposal by the water board with regard to in stream water flow in the Gualala River and respectfully request that it reconsider this proposal.

Sincerely,

Robert B. Welch  
Francine Shapiro

116 Shepherd's Close  
The Sea Ranch, CA

