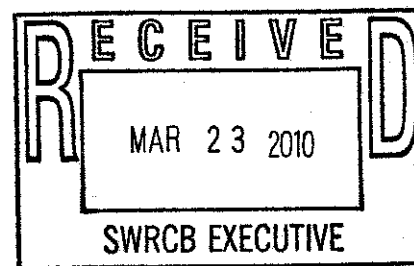


**From:** Art and Ruth Erickson <erickson4150@yahoo.com>  
**To:** <commentletters@waterboards.ca.gov>  
**Date:** 3/23/2010 2:15 PM  
**Subject:** February 2010 Draft North Coast Instream Flow Policy



State Water Resources Control Board  
Jeanine Townsend, Clerk to the Board

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

The proposed policy provides limited, and generally constraining, criteria by which a "site specific" alternative would be evaluated. Any alternative could be subjected to an ill-defined and arbitrary concept rather than a scientifically justified standard. The Principles which the draft policy indicates would apply to the site specific studies also direct water to be dedicated first and foremost for instream flow. There is no provision for consideration of other beneficial uses of water. There is no provision for consideration of the impacts of the policy.

The proposed policy should be scrapped or revised to require that economic and other impacts on water users be taken into account and avoided. The policy should employ science applicable to the relevant stream. The policy should be evaluated including burden as well as benefit.

The proposed policy was announced on February 18, 2010. Forty-five days is an inadequate time for evaluation of the impact of a very complex and highly technical policy on specific sites. While The Sea Ranch has had the opportunity to do an initial evaluation of its impacts, I have not had the time needed to evaluate the economic effects on my property on The Sea Ranch, or on the larger coastal community. I request that the SWRCB extend the comment period for 90 days.

The SWRCB has scheduled one weekday hearing on the proposed policy, to be held in Sacramento, many hours drive for those whose lives will be affected by the proposed policy. I request that the SWRCB schedule workshops and hearings in the north coast region so that those citizens whose homes and livelihoods will be affected by the SWRCB's decisions may be heard.

There is also extremely limited use of water for landscaping on The Sea Ranch due to the extensive use of native plants.

Ruth Erickson, (Mrs. Arthur K. Erickson) Unit 12, Lot 28