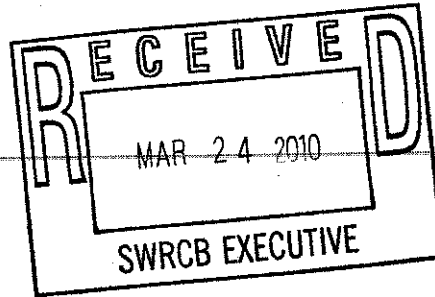


commentletters - COMMENT LETTER AB2121 POLICY

From: <Sonomacn@aol.com>
To: <commentletters@waterboards.ca.gov>
Date: 3/24/2010 3:46 PM
Subject: COMMENT LETTER AB2121 POLICY
CC: <ecarrillo@sonoma-county.org>



To SWRCB Members
Jeanine Townsend, Clerk to the Record

RE: Comment Letter - AB2121 Policy
February 2010 Draft North Coast Instream Flow Policy

STRONG OBJECTION TO THIS DRAFT POLICY AND REQUEST FOR EXTENSION OF TIME

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

As Sea Ranch property owners, we have significant concerns about your staff recommendation in your Instream Flow Policy on The Sea Ranch's water supply, which includes the Gualala River.

As we understand it, this policy **MUST** be evaluated by including burden, especially on The Sea Ranch area, as well as benefit. It appears as if there is no provision to take into account the impacts on The Sea Ranch, while the criteria remain focused exclusively on fish and instream flow. This policy could leave The Sea Ranch without water for extended periods of time. Water needed for The Sea Ranch should **NOT** be re-dedicated to instream flow. The Sea Ranch already has an excellent water conservation program and a very low gallons per capita per day usage. The impact on property value in The Sea Ranch would be enormous. The proposed regional policy does **NOT** take into account the hydrology of the Gualala River nor the primary threats to fish. It was not validated for the Gualala River, but instead for inland conditions far different than ours. The policy has no basis in science applicable specifically to the Gualala River watershed or to our pumping from the aquifer within this watershed.

The proposed policy should be scrapped or 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.

At the very least, more time is needed for evaluation of the impact of a very complex and highly technical policy on specific sites. We as property owners have not had adequate time to evaluate the economic effects on our property. Additionally, hearings held in Sacramento are too far away for those of us affected by the proposed policy to attend. We 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.

**Signed very concerned Sea Ranch property owners,
Ruth and Richard Conley**