

From: "Peter Bradford" <bradfordranch@wildblue.net>
To: "Karen Niiya Senior Engineer" <AB2121Policy@waterboards.ca.gov>
Date: Wed, Apr 16, 2008 8:42 PM
Subject: Comment Letter - AB 2121 Policy

Peter Bradford
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April 16, 2008

Karen Niiya Senior Engineer
Division of Water Rights
1001 I Street, 2nd Floor
Sacramento, CA 95814

Dear Ms. Niiya:

The Draft Policy is not a workable approach to protecting instream flows. Instead of providing water users guidance on appropriate instream flows, the Draft Policy establishes restrictive, regional criteria that severely limit the ability to divert water when it is most plentiful. This misguided attempt to preserve instream flows for the benefit of salmonids fails to follow California water law, fails to help fish, and actually impairs the ability of many farmers to make improvements to fish habitat.

As a third generation Californian and one who has strived to not cause any harm to the land, wildlife or environment while conducting my family owned business of raising commercial beef cattle, I find the draft policy lacking any sound basis for implementation. If this policy is the result of the best scientific research the State of California has to offer then we better just roll over and let someone else take over; China could probably do a better job!

The Draft Policy is not based upon sound science. It sets standards for very small watersheds, less than a couple square miles, even though the science supporting the policy comes from large watersheds.

In addition, the State Board has not been able to determine the extent in which instream flows are necessary to maintain the fishery in north coast streams, nor have they accounted for the many factors impacting fish populations besides flow.

Water in California must be used to its full potential - to benefit habitat as well as agriculture.

I urge the State Water Board to adopt an alternative policy that is based on sound scientific facts, provides the appropriate balance between economic development and protecting natural habitat and wildlife species, while using water to its full potential.

Sincerely,

STATE WATER RESOURCES
CONTROL BOARD
2008 APR 17 PM 5:00
DIV OF WATER RIGHTS
SACRAMENTO

Peter Bradford
Partner
Bradford Ranch