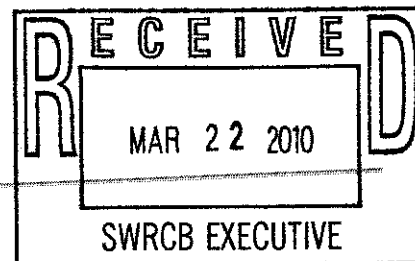


commentletters - Comment Letter - AB2121 Policy - April 27, 2010 Hearing

From: "Allan Abshez" <allanabshez@sbcglobal.net>
To: <commentletters@waterboards.ca.gov>
Date: 3/22/2010 7:49 AM
Subject: Comment Letter - AB2121 Policy - April 27, 2010 Hearing
CC: <ecarrillo@sonoma-county.org>



Honorable Members of the State Water Resources Control Board:

My wife and I are property owners in The Sea Ranch community, which is comprised of approximately 1800 homes and is located in Sonoma County. I am writing to urge the Board not to adopt the staff-recommended proposed policy in furtherance of AB 2121, which will be considered by the Board on April 27th, and is intended to enhance instream flows in the north coast region, which includes the Gualala River.

The staff-recommended proposed policy should not be adopted because it could leave the 1800 homes in The Sea Ranch without water supply for days or even months each year. This would destroy The Sea Ranch community, cause losses of \$2 billion in property value, and have severe effects on jobs and the economic vitality of the region.

The proposed policy should be revised to require that the economic impacts on current water users be taken into account. Water needed for The Sea Ranch should not be re-dedicated to instream flow, especially when it is not even needed for that purpose.

The Sea Ranch water rights and facilities were developed and conditioned to meet both fish protection and municipal water service needs based upon assumptions far different from those reflected in the proposed policy. Historically and currently, The Sea Ranch has been allowed to operate its wells, diverting from the aquifer underlying the South Fork Gualala River, year-round as long as river flows are within the permitted range. The Sea Ranch adheres rigorously to the required water volume bypass flows for fish protection. The Sea Ranch has an excellent water conservation program and a very low gallons per capita per day usage. The staff-recommended policy appears to assume unimpaired conditions are the starting point and without any consideration of current municipal water service needs.

The proposed policy assumes one size fits all. It does not take into account the hydrology of 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 Gualala River is designated as impaired by the State not because of aquifer pumping, but because of silt and high temperatures caused by de-vegetation of riparian zones.

For all of the foregoing reasons, the Board should decline to adopt the staff-recommended policy and direct staff to develop a policy that requires the economic and other impacts to current water users be taken into account, and that addresses conditions like those found on the South Fork Gualala River.

Thank you for your consideration,

Allan Abshez
36507 Sculpture Point Drive
The Sea Ranch, California 95445

cc: Supervisor Efren Carrillo, Fifth District Supervisor, County of Sonoma
Assemblyperson Wesley Chesbro
Senator Pat Wiggins
Governor Arnold Schwarzenegger
Dan Pellissier, Deputy Cabinet Secretary, Office of the Governor