commentletters - Harmful Effects of the Proposed State Water Resources Control Board (SWRCB) Instream Flow Policy on The Sea Ranch's Water Supply

From: "Gundersen, Cameron" <CGundersen@mednet.ucla.edu>
To: "'commentletters@waterboards.ca.gov'" <commentletters@waterboards.ca.gov>
Date: 3/25/2010 2:17 PM
Subject: Harmful Effects of the Proposed State Water Resources Control Board(SWRCB) Instream Flow Policy on The Sea Ranch's Water Supply

Dear Members of the SWRCB,
As a property owner at Sea Ranch, I am extremely concerned about the negative effects of the newly proposed instream flow policy on water supply at Sea Ranch. I am urging you to allow members of the Sea Ranch community to negotiate less draconian provisions which are absolutely crucial to the preservation of Sea Ranch as a viable residential community. Without modifications in the planned policy, it is very likely that Sea Ranch will no longer be able to survive, because water would not be available for long periods of time every year. We urge you to take into account the human, economic and social implications of your proposed actions. Additional issues that should be considered in your deliberations are included:

-- The Regional Criteria would limit the diversion season to December 15 - March 31. Historically and currently, we are and have been allowed to operate our wells, diverting from the aquifer underlying the South Fork Gualala River, year-round as long as river flows are within the permitted range. We adhere rigorously to the required water volume bypass flows for fish protection, and typically operate the wells from December July, although in the 2008-2009 drought, pumping didn't begin until February 2009.

-- The proposed policy would require huge flows in the South Fork Gualala River before we could operate the wells. The flows would have to be about 10 times greater than the current permitted policies commonly referred to as Term 14 of The Sea Ranch Water Diversion permit.

-- Effects during drought will include very severe conservation measures. Even with such measures in place, our reservoir is likely to dry up quickly after March 31 and is unlikely to be refilled if drought continues. The Sea Ranch has an excellent water conservation program and a very low gallons per capita per day usage.

-- There is no low-cost or otherwise feasible work-around. A greatly expanded storage reservoir requires a site that may not exist, huge funding, and new water rights. A desalination plant presents major environmental and economic issues. Obtaining the permits for either would be difficult, and permitting and construction would be costly and of questionable feasibility.

-- Effects could be significant loss of the $2 billion property value at The Sea Ranch. Resale markets in other developments that have lost their water supply have a small fraction of their initial value.

-- The proposed regional policy does not take into account the hydrology of the Gualala River nor the primary threats to fish. The State has designated the Gualala River as impaired because of silt and high temperatures caused by de-vegetation of riparian zones.

-- The proposed policy assumes one size fits all. 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.

I thank you in advance for your consideration of this very serious matter.

Sincerely,
Cameron Gundersen
