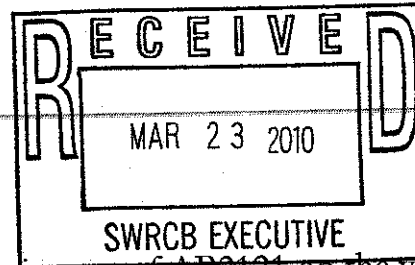


commentletters - COMMENT LETTER: AB2121 POLICY

From: Lee Zorn <lee.zorn@sbcglobal.net>
To: <commentletters@waterboards.ca.gov>, <ecarrillo@sonoma-county.org>
Date: 3/23/2010 4:23 PM
Subject: COMMENT LETTER: AB2121 POLICY
CC: Carla Zorn <carla_zorn@intuit.com>



Dear Sir/ Madam,

I am writing out of deep concern over the possible impact of AB2121 on the value of my property at The Sea Ranch, CA 95497. This policy, if enacted as a general blanket restriction, will create months long water shortages to our water supply and cause extreme financial hardship in our community. The proposed bill AB2121 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.

The Regional Criteria would limit the diversion season to December 15 - March 31. Historically and currently, The Sea Ranch has been allowed to operate 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, and typically operate the wells from December to July, although in the 2008-2009 drought, pumping didnt begin until February 2009. The proposed policy would require huge flows in the South Fork Gualala River before TSR 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. This higher flow volume would not necessarily improve the health of the river..... but it would definitely create human hardship.

The effects of this proposed policy 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.

The most dire effect of this new policy could be significant loss of the \$2 billion in property value at The Sea Ranch. Resale markets in other developments that have lost their water supply have but a small fraction of their initial value. The Sonoma Tax Base will plummet.

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. There are very unique factors here which need to be considered in their totality.

The proposed policy would permit The Sea Ranch to present site specific studies as an alternative - but additional time is needed and funds collected in order to carefully evaluate this policy - burden as well as benefit. It is imperative, that this new policy **employ science that addresses the very specific conditions found on the South Fork Gualala River and consider the huge financial hardship on Sea Ranch owners** as well as the huge negative impact this could have on Sonoma's real estate tax base. Please act decisively and intelligently to protect the collective interests of The Sea Ranch as well as the health of the Gualala River.

Thank you for your consideration of this critical matter.

Sincerely,

D. Lee Zorn