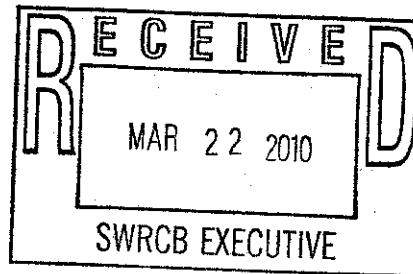


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March 21, 2010

Jeanine Townsend, Clerk to the Board  
 State Water Resources Control Board  
 1001 I Street, 24<sup>th</sup> Floor  
 Sacramento, CA 95814



**RE: Comment Letter-- AB121 Policy**

Belatedly, just on Friday evening, Sea Ranch Homeowners were made aware of possible new regulations that may greatly affect our water usage on Sea Ranch. In hastily reading the proposed regulations, it appears to me that if adopted as presented, the Sea Ranch Water Company cannot meet these requirements for probably several years, without undertaking additional new studies of our water system and spending millions of dollars of expense for new storage facilities, pumps and larger pipelines.

**I ask that the State Water Resources Control Board extend the comment period until our professional consultants have had time to study the proposal. Also that the scheduled April 27<sup>th</sup> meeting be delayed so that we can collect data and give an intelligent response.**

The Sea Ranch Water Company was purchased from the developer in 1995 at the end of an expensive lawsuit. Our lawyers and consultants pursued due diligence in examining the infrastructure of the water system before TSRA (homeowners association) purchased the water company. Building a reservoir for an adequate water supply at buildout was a chief concern. TSRA in fact paid for part of the reservoir construction, in order to build a larger reservoir for more storage. We worry about dry years, the environment and the fishery.

Since the purchase of the Water Company, TSRA has been involved with a fix of the new leaking reservoir and the replacement of 50 year old leaking equipment. We have hired new staff and been through three new Community Managers. The SRWC has hired consultants to provide a water management plan to upgrade the system, especially to meet fireflow measurements in low pressure areas in the system. A new 500,000 gallon tank is in the planning stages to solve our pressure problems and provide additional storage. However, it appears that this tank alone cannot provide enough storage to meet your new proposed requirements.

Somehow in this process of being focused on the infra-structure problems, TSRA management and the Water Company managers missed or overlooked the water permit and water license. A few months ago we discovered that our water permit had expired years ago--nobody caught it. SRWC continues to operate under Term 14 of the previous permit and not pump during low flow times in the river when flow is less than 5 cfs.

Interestingly, it appears that State Water Resources never noticed that the SRWC permit had expired. I personally have never encountered a situation where a permit or license had expired and I was not immediately informed that I was in violation.

Currently the Sea Ranch Water Company is reapplying for an extension of the expired permit or obtaining a water license. We need to have this in place before any new rules or modifications are imposed upon us.

Most of us here at Sea Ranch are retired or semi-retired. There are currently 1800 homes on Sea Ranch with 30% full occupancy. The rest of the homes are owned by people close to retirement age, and in the future, with more full time residents, more water will be required. Conservation is high on all Sea Ranchers list. We are equipping our homes with solar panels, low flow toilets, etc. We don't water our lawns or wash our cars often. Hybrid autos are everywhere--probably one of the highest concentrations in the country.

If these rules go into effect in the near future, we are concerned that Sea Ranch Water Company cannot meet these requirements; that our property values will be affected and new construction will cease. Tourism will be affected in that many of our homes are on vacation rentals. Businesses in Gualala may also suffer from decreased tourism.

As a geologist and environmentalist, I have studied the Gualala River watershed for the past 35 years. There are many technical reasons why our water system is different from other systems. The Sea Ranch water wells are drilled into the San Andreas Fault Zone in the mainstem of the South Fork below the junction with the Wheatfield Fork. The mainstem of the river is 500 to 1000 feet wide with a very low gradient. Sand and gravel fills the bottom of the valley for a thickness of 180 feet. This vast water reservoir extends 10 ½ miles downstream to the mouth of the river at Gualala. It also extends upstream in the South Fork and Wheatfield Forks for another ten miles. The Sea Ranch wells are drilled into the base of the mainstem alluvium and produce water from groundwater, not surface water. Pumping tests have never shown any drawdown of the river trace at the surface. The entire watershed is 300 square miles with approximately one half of it draining past our wells. Rainfall in the watershed ranges from 30 inches to 65 inches per year.

There have been several studies of the Gualala River Watershed and the fishery. Data from these studies needs to be introduced as evidence for this hearing. With additional time, this data could be collected and referenced as part of our testimony. **Please extend the comment period so that we can be properly heard before these regulations are adopted.**

Respectfully submitted,



Thomas E. Cochrane, home owner  
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