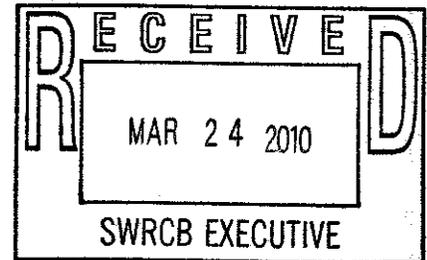


Bernadette Bell
Box 270 (115 Black Point Reach)
The Sea Ranch, CA. 95497-0270

23 March 2010

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



Subject: Comment Letter AB2121 Policy
February 2010 Draft North Coast Instream Flow Policy
Strong Objection to this Draft Policy
Request for 90-day Extension of Comment Period

Dear Board Members,

I request that the following comments be made part of the administrative record for the Proposed Policy for Maintaining Instream Flows in Northern California Coastal Streams.

I write to object in the strongest terms to the proposal by the staff of the State Water Resources Control Board (SWRCB) in response to AB2121 to override longstanding policies on water diversion from streams and impose infeasible limits on seasonal well use and on mandated baseline river flows.

I have been a part-time resident of the Sea Ranch for 28 years. The Sea Ranch water supply system was developed in full compliance with bypass requirements over the course of five decades, and these requirements are rigorously obeyed. To change the rules now, without regard to the drastic negative impacts on our community is unfair and inappropriate.

The proposal is a lockstep regional proposal that fails to take into account variations in local conditions. The scientific basis on which the proposal was developed fails to take account of the actual conditions in the South Fork of the Gualala River, and is therefore flawed. The aquifer of the Gualala River has proved adequate to maintain appropriate levels of instream flow with under the present requirements under which Sea Ranch wells draw water. Two parts of the proposal, limiting the diversion season to December 15 to March 31 and increasing mandated river flows by something like a factor of 10 are wholly out of line.

The criteria for site-specific exceptions in the proposal are poorly specified and inadequate. In particular, these criteria obviously need to provide for economic and community impacts, costs, and the decades-long administrative record to be taken into account as significant factors.

I further ask that the SWRCB extend the comment period for 90 days.

Yours sincerely,

Bernadette Bell

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