



October 21, 2007

Chairperson Valerie Brown
Board of Supervisors
575 Administration Drive, Room 100A
Santa Rosa, CA 95403-2887

Subject: Negative Declaration for File No. UPE04-0040, Gualala Instream

Dear Chairperson Brown:

On behalf of the Friends of the Gualala River (FoGR), I am providing the following comments on the Sonoma County Permit Resources and Management Department Negative Declaration for revising mining standards for the mining reach of the Gualala River, Sonoma County, California (Negative Declaration for File No. UPE04-0040, Gualala Instream).

I am a Professional Geologist and Certified Hydrogeologist in the State of California and have worked on surface and ground water resource management issues as a private consultant for seventeen years. I have obtained a Master's degree in Geology from Miami University (Oxford, Ohio) in 1989. I have been providing professional hydrology services in California since 1991 and routinely manage projects in the areas of surface- and groundwater hydrology, water supply, water quality assessments, water resources management, and geomorphology. Most of my work is located in the Coast Range watersheds of Northern and Central California. I am very familiar with the Gualala River watershed as I have provided professional hydrology consulting services to the Sotoyome Resource and Conservation District and State Coastal Conservancy on a hydrologic and geomorphic investigation of the lower Gualala River and estuary and also a study of summer low flow hydrologic conditions on the major tributary's of the Gualala River.

I have reviewed the Negative Declaration and a number of supporting materials, including, but not limited to: Gualala Redwood Inc.'s 2007 Application for Permit Renewal; Matt O'Connor's 2003 fluvial geomorphology assessment for gravel mining on the Gualala River; and NOAA's guidelines to staff for the evaluation of sediment removal actions from California streams. I have reviewed most other technical hydrology and geomorphology reports completed on the Gualala River watershed and have reviewed FoGR's and my own photograph collection of selected reaches of the river. Based on my review of these materials, it is my professional opinion that the mitigations and monitoring requirements presented in the Gualala Instream Negative Declaration can not responsibly address whether the future mining operations will or will not impart adverse environmental impacts on the hydrologic and ecologic resources of the Gualala River. I feel updated assessments on environmental conditions, more complete guidelines regarding impact assessments and a fuller suite of mitigation measures are required as part of the environmental compliance for this proposed action/project. The main reasons I have reached this conclusion are as follows:

- The baseline hydrologic, geomorphic and ecologic conditions by which potential impacts will be evaluated are out of date and do not accurately reflect current conditions. Requirements for keeping characterization of the baseline current through the life of the mining permit should be better defined and expanded (in area and in terms of ecological conditions).
- Recent and unpermitted mining actions have led to what would be characterized as adverse impacts to geomorphic and ecological conditions under the proposed Negative Declaration (e.g., mining techniques that lead to channel avulsion at Valley Crossing). Is this what is to be considered an acceptable baseline by which future conditions are compared?
- The recent gravel mining approach that led to channel avulsion at Valley Crossing and riparian corridor abandonment resulted from gravel mining operations that were not implemented consistent with the gravel mining approach guidelines recommended by NOAA. The permit application also includes a wide variety of gravel removal methodologies that leaves the system open to “business as usual” and possible continued impacts.
- The Negative Declaration does not address potential cumulative impacts, either in a spatial or temporal sense.
- The application and Negative Declaration do not adequately address potential changes in summer low-flow hydrology as a result of gravel processing operations. Water supply in the Gualala River watershed is most highly limited and sensitive to diversion and water quality impacts during the gravel mining season.
- The Gualala River is listed under Section 303d of the Clean Water Act as being impaired for sediment and water temperature. Any project-induced changes in water flow volume, changes in sediment transport dynamics or separation of flow alignments from riparian cover/corridor are more likely to introduce adverse impacts to a listed river than non-listed river.

If you have any questions or concerns, please call me.

Sincerely,



Greg Kamman
Principal Hydrologist