

650 Karen Way
Santa Rosa, California 95404
December 20, 2004

Leslie Markham
California Department of Forestry
135 Ridgeway Avenue
Santa Rosa, California 95404

Re: THP 1-04-030 Whistler Hansen
August 7, 2004 Memorandum from Matt O'Connor to Hansen/Whistler re
"Response to Comment on Fog Drip"

Dear Ms. Markham:

Mr. O'Connor's interpretation of Elizabeth Keppeler's non-published in-house report is very misleading and a classic example of how your agency can allow itself to be misled (and by extension be responsible for misleading the public) when the studies referred to are not available to the public, are not peer reviewed and are not added to the administrative file.

No Keppeler material was included anywhere in the public file.

Mr. O'Connors interpretation of Ms. Keppeler's conclusions have no basis. Keppeler's conclusions are very **site specific to an inland location quite dissimilar to that of Brushy Ridge**. O'Connor does not mention this.

Within the body of her unpublished notes she is careful to point out that 1. Fog drip has not been measured at Caspar Creek 2. "Summer fog within the experimental watershed is **far less frequent** than in coastal Mendocino County because of the more inland location of our study site." 3. In trying to explain the differences in post-harvest streamflow between the north and south forks of Caspar Creek, she states "Perhaps the smaller postharvest streamflow increases observed on SFC relate, in part, to this loss of fog drip. It is quite plausible that SFC receives more fog than NFC because of its proximity to the coast..."

But O'Connor's interpretation of her conclusions in his August 7 Memorandum to you states, "In other words, decreased water inputs from fog drip associated with canopy removal are very small, and are insignificant compared with increased delivery of precipitation to the soil resulting from removal of forest canopy." This appears to be a blanket conclusion unsupported by the Keppeler's site specific studies. Although how can the public meaningfully comment without having access to the study?

Keppeler's methodology itself has not been subjected to rigorous review.

The hydrological effect of fog-drip is an extremely critical part of analyzing the cumulative impacts of forest conversion. Without serious study of this, this plan/conversion and others in the coastal ranges should not be approved by CDF.

Sincerely,

Linda Haering