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Northern Region Headquarters  
California Department of Forestry and Fire Protection  
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To whom it may concern:

I have reviewed three proposed projects for timber harvest and timber conversion to vineyards in the watershed of the Gualala River (THP 1-04-030 SON {TCP 04-530}; THP 1-04-055 SON {TCP 04-533}; THP 1-04-059 SON {TCP 04-531}). Please include my comments for the three referenced projects.

I have reviewed many other timber harvest plans in California (state and federal) and have substantial education and research on aquatic ecosystems, in particular on streams affected by timber harvest and related activity. For nearly 30 years I was a faculty member in aquatic ecology at the University of California (Berkeley and Davis) and am now retired.

These three projects highlight the wholly inadequate process and methods for evaluating cumulative impacts of proposed projects. The checklist approach has led to a descriptive narrative that always leads to a conclusion of no impact. A requirement to consider past and future projects is reduced to a simple formula: list the projects, mention that past projects were conducted under the Forest Practices Act and therefore were non-significant and conclude that another project would cause no additional problems because no problems exist. Problems in a watershed, should they exist, are all a result of a primitive past before the Act, or as in THP1-03-040 SON, analysis is reduced to "...vineyard farming within the assessment area does not appear to contribute significant amounts of sediment to watercourses."

In fact, much space is devoted in the plans to the legacy of impacts inherited from long before and such conclusions given as "During the last 10 years, environmental impacts have been vastly less than those experienced in earlier decades up to around 1972." (THP 1-04-055 SON) and "Logging prior to the Forest Practices Act has impacted the watercourses throughout the assessment area" (THP 1-04-049). But the claim is made that the watershed is now stable, among other reasons, because "Harvesting methods

include skyline cable yarding and helicopters that keep tractors off of steep slopes and prevent logs from skidding on top soil that increases the potential for soil loss and/or erosion” (THP 1-04-030 SON) and “use of thinning and selection silvicultural methods” (THP 1-04-055 SON). Yet in the THP 1-04-055 SON, there is a table listing 25 non-industrial timber plans “filed in the last years.” Of these 25 plans, only one used cable yarding exclusively, 10 of the 25 used tractor yarding exclusively and the rest used a combination of the two yarding methods. Silvicultural methods used in 14 of these plans were some form of clearcutting that amounted to 69% (1182 acres) of the acres harvested (1714 acres). Thus, there is little connection between the narrative and an analytical approach to the situation in the watershed.

Two examples from these three projects show the fallacy and weakness of the current approach to assessing cumulative effects. The first has to do with the assessment of changes in peak flows. In all cases, the THPs conclude that peak flows could be a problem, but since the area of project is so small and best practices are employed, any change in peak flow would be too small to notice. Thus, although the WAA continues to show evidence of past impacts (see THP 1-04-055 SON, Cumulative Assessment Checklist) that have impaired the watershed, the plans can conclude with no analysis that additional increments of disturbance are too small to notice. This is not science. It is handwaving. If project by project the entire watershed were converted to vineyards, this sort of analysis would lead to the absurd conclusion that no change in peak flows would still be possible. The fact that there are other projects in the watershed assessment area is addressed merely by listing and dismissing. There is no attempt in any plan to link the possible effects of other recent projects or in any way to add up the risks of various factors. The exercise is completely tautological—approved projects have no cumulative effects by definition, our project is too small to notice, therefore nothing is added to nothing.

The second example has to do with providing wildlife “corridors” or areas left unfenced within the project boundaries. The assessments provide no clue to where animals might be coming from or going to on such a corridor or whether the habitat remaining in such areas is suitable. Further, it must surely be obvious that a corridor is more than a section within a smaller area that is unfenced. Without some way of considering the linking of “corridors” in one project with “corridors” on other projects, the rationale is empty.

There has been no credible analysis of potential cumulative effects for these projects in the watershed assessment area. There is no linking of projects on a list and no attempt to quantify the risks of adding new disturbances to a stream basin all parties acknowledge is impaired.

Sincerely,

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Professor Emeritus