



Friends of the Gualala River

PO Box 1543, Gualala, CA 95445 (707) 886-5355 GualalaRiver.org

Sonoma County Permit Resources and Management Department

Attention: Paula Stamp

2550 Ventura Avenue

Santa Rosa, 95403

September 4, 2007

**Regarding: Draft Negative Declaration (California Environmental Quality Act) general comments
/Gualala River gravel mining (File No. UPE04-0040), Sonoma County**

Dear Ms. Stamp:

Please submit the following comments into the file of the Draft Negative Declaration.

Friends of the Gualala River (FOGR) is very concerned that the proposed project of re-permitting instream gravel mining and amendment of ARM standards on the Gualala River may have significant impacts that are either unmitigated or inadequately mitigated by the actions proposed and described in the Negative Declaration. The very visible mining site, nearby reaches and riparian roads effected by this presently nonpermitted operation have afforded more than adequate opportunity to observe significant negative effects of this operation to date. For example, recent positive changes in riparian incising, hole formation, refugia, and structure were wiped out by recent bar mining at the Twin Bridges confluence. With this long over due permitting process now finally under way, our review of the proposed Negative Declaration have caused numerous concerns regarding its adequacy to put adequate mitigations in place.

Our concerns include the following:

1. Lack of assessment of recent mining operations in the establishment of a proper baseline of conditions for resumption of mining.
2. The document's lack of consideration for establishment of historical and baseline site-specific, year-specific recharge rates.
3. Any addressing of the needed inclusion and assessment of bar size, alteration, and channel morphology since data was last reliably collected for past, now lapsed, permits circa 2003.
4. The lack of adequate assessment of past mining methods and possible other alternatives that would more effectively avoid significant impacts and allow enforcement and corrective actions.
5. To date the county has not exercised their rights and obligations to properly monitor this operation either through pressing forward with the permitting process or on-site monitoring and enforcement during these intervening years with no issued permit in place. Proper post permit issuance monitoring with other participating agencies will be needed and required by law.
6. Lack of assessment and mitigation proposals that address current baselines in the upstream geomorphology of the channel, bars, and changes in the vegetation that have significantly changed in the recent years as impacts from past resource extraction have moved through the riparian areas.

Friends of the Gualala River believes that potential significant direct, indirect and cumulative impacts will result from the proposed permit action despite the proposed mitigation. It therefore is the County's duty as lead agency to require an EIR for the project or correct the deficiencies in assessment, mitigation, and alternatives as pointed out in this and other comments. Recirculation of the Initial study and Negative Declaration with adequate changes to these parameters and actions would then be needed.

We look forward to your addressing of these concerns and the attention to all actions that impact the health of the river.

Respectfully submitted on behalf of FOGR,

Chris Poehlmann
Vice President
Friends of the Gualala River