



Friends of the Gualala River

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June 2, 2004

Subject: THP 1-04-030 SON (TCP 04-530) "Hansen/Whistler"

THP 1-04-030 SON (TCP 04-530) "Hansen/Whistler" is one of a rash of THPs and applications for conversions from forestland to wine vineyards. The cumulative effects on the Gualala River of these this THP, together with others already approved or soon to be filed, will be great indeed. Please place a copy of this letter in the administrative records for THP 1-04-030 SON (TCP 04-530) "Hansen/Whistler".

The Gualala River is listed as an impaired river under 303(d) of the Clean Water Act. Costly time and energy have been and are being expended by governmental agencies and watershed stakeholders to restore this River, its watershed, and its endangered species. CDF should not allow the loss of forestland required the survival of struggling Salmonid populations in favor of upslope vineyards.

The Gualala River is already suffering degradation of habitat because of sedimentation and temperature increase caused by logging. This THP will degrade habitat further. Water quality for downstream users, the residents of Gualala and The Sea Ranch, is likely also to be degraded because of the use of pesticides.

The loss of forestland in the Gualala River watershed has progressed under THPs which claimed the environmental effects under any single THP would be "negligible" or "imperceptible." Yet these effects have left us with a sedimentation- and temperature-impaired River. The subject vineyard conversions will exacerbate these problems.

Habitat fragmentation is a result of the unmanaged piecemeal nature of the clearcuts and vineyard conversions already approved by CDF. Irreplaceable ecosystems have been destroyed by this steady encroachment. Habitat is lost and ancient migration routes and food sources are permanently interrupted. The subject THP will worsen this problem.

The high fences that are erected to "protect" vineyards prevent access to streams, rivers, and other water and food sources to terrestrial wildlife. The land is clear cut, the remaining living stumps with their irreplaceable genetic adaptations are ripped out, and the land is plowed in furrows to prepare it for a land preparation and vineyard management program based on intensive use of pesticides. These pesticides are a threat to the local aquifer and local water supplies; they are also a threat to the quality of the water supplied to the residents of Gualala and The Sea Ranch.

Water is scarce in the upper Gualala River watershed. Viticulture requires large amounts of water for irrigation, and also for frost control and delivery of pesticides and fertilizers. Quickly extracting large amounts of water from the watershed's mountain aquifers is an instable proposition. The new conversions attempt to avoid this by proposing to construct large reservoirs to catch runoff during the rainy season. The collected water, which today both helps recharge the local aquifers and helps the Gualala River recover from the effects of excessive logging, will never reach the downhill streams after the reservoirs are constructed. The River and its tributaries will not receive the peak winter flows needed to flush out accumulated sediment and debris; yet this is required if fish and wildlife habitat is to be restored.

The effects on aquifers and downstream water flows warrant the preparation of an Environmental Impact Report (E.I.R.) for this THP and, in general, all forestland conversion applications in the Gualala River watershed due to:

- the water scarcity of the west county area
- the 303(d) Clean Water Act listings of the Gualala River
- the dire situation of the threatened indicator salmonid species
- the large, complex ecological changes, and effects of conversions, of which habitat fragmentation is just the most obvious
- the clear written mandate of Sonoma County's General Plan
- the need to study the effects of commercial reservoirs and wells on local streams, aquifers, and downslope water availability and quality
- the need to study the effects of pesticides and herbicides, commonly used for vineyard conversions, on local and downslope water quality

Sincerely,

James A. Jordan, Jr.

James A. Jordan, Jr
Secretary
Friends of the Gualala River