



2/10/97

State of California
Regional Water Quality Control Board
North Coast Region

2002 303(d) List Update
Reference #7

K Kelly 15
12/11/97
Aerial Photography
Digital Mapping
GIS Services
Image Processing
Forestry Management

Members of the Board,

The following comments are submitted to the Board on behalf of Gualala Redwoods, Inc.

In general, it appears that recommendations have been made to the board to list streams as temperature impaired based on unsubstantiated claims made by the public. This is especially true with respect to the Gualala River which was placed on the petition to list based on the testimony of one person. This same persons testimony was used to place the Garcia, Mattole, Navaro, Ten Mile and Van Duzen Rivers on the petition to be listed as temperature impaired. It seems highly unlikely that one person or group of people would have the time and energy to gather scientific data on all of the above streams to support these findings. To our knowledge no temperature data has been presented to the regional Water Quality Control Board. We request that the Board review or acquire real stream temperature data which supports their actions rather than list streams based on unsubstantiated public concerns.

We concur with the staffs findings for the Gualala River, to defer action until after reviewing an assessment of the Gualala River Watershed within the next few months.

Gualala Redwoods, Inc. has been monitoring stream temperatures on the Gualala River and tributaries within their ownership since 1994. Our data indicates that temperatures within the majority of our ownership are adequate for spawning and rearing of Coho salmon and steelhead trout. This data has been sent to the Forest Science Project for review and interpretation. The results of our temperature monitoring will be available by the end of February. At that time we will submit a report to the Water Quality Control Board for your consideration. We request that the board defer action on listing until Gualala Redwoods, Inc. stream data can be submitted and reviewed by your staff.

Sincerely,
Hammon, Jensen, Wallen & Assoc.

Scott Kelly
Scott Kelly