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# Friends of the Gualala River

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PO Box 1543 Gualala, CA 95445 707-785-3431 [www.gualalariver.org](http://www.gualalariver.org)

RE: Order WRO 2003  
Order Determining Legal Classification of Groundwater  
In the Matter of  
Permit 14853 (Application 21883) of  
North Gualala Water Company, and  
Request for Determination of Legal Classification of Groundwater  
Appropriated under this Water Rights Permit

To the SWRCB:

Friends of the Gualala River supports your draft order finding that the wells of the North Gualala Water Company at Elk Prairie draw from a subsurface channel. Both the technical evidence cited in support of your order and our lay opinion agree that the physical setting of Elk Prairie is a canyon formed by slopes on either side meeting below the channel of the Gualala River. The water flowing underground within that canyon is clearly in a subterranean stream flowing through a known and definite channel.

Your authority for requiring a permit for the use of that water is clear from §1200 of the Water Code. It is also important to the members of the Gualala community and to the people of the State of California that you exercise your authority over that water to safeguard the interests of the people of California.

Thank you,

For Friends of the Gualala River  
Douglas J. Hammett  
Attorney at Law  
Member of the Steering Committee of  
Friends of the Gualala River