



Friends of the Gualala River

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Visit our website: GualalaRiver.org

November 9, 2007

Teresa Beddoe, Project Coordinator
Ray Hall, Coastal Permit Administrator
Mendocino County Planning and Building
790 South Franklin Street
Fort Bragg, CA 95437

RE: **CDP #55-2006, Deny**

Dear Ms. Beddoe & Mr. Hall,

I am writing on behalf of Friends of the Gualala River, to urge you to **deny** application CDP 55-2006 for a permit to construct a 285-foot long concrete block retaining wall behind the unpaved Surf Supermarket parking lot in downtown Gualala.

The proposed retaining wall is unnecessary, because the bluff itself is relatively stable. The current, unpaved parking area is composed of inappropriately placed, un-compacted and unstable fill; the fill placed by the landowner is eroding, but there are other ways to resolve that problem without a huge concrete block retaining wall (for example, see comments submitted by civil engineer Francis Drouillard).

The wall would be a visual eyesore. The main-stem of the Gualala River has been recognized by the California legislature as a Wild & Scenic River. The wall would be visible from the County Park, including the Gualala Point beach, and from the estuary (lagoon). The Park is visited by many thousands of people every year, including both local residents and visitors to the area. The natural beauty of the bluff would be permanently damaged by an ugly concrete block retaining wall.

Construction of the proposed wall would disturb existing vegetation and soil, making it vulnerable to increased invasion and dominance by non-native plants, reducing native biological diversity.

The landowner has explained publicly that this proposal is part of a larger project to demolish existing buildings, create a large paved parking lot, construct new commercial buildings and expand the Surf Supermarket on the bluff overlooking the Gualala River estuary / lagoon.

Since the proposed wall is part of a larger project, reviewing the wall alone, without considering the potential impacts of the rest of the project, constitutes impermissible project segmentation under the California Environmental Quality Act. The cumulative impacts of the entire project must be considered before the wall could be approved.

The Gualala River estuary, which forms a closed lagoon during most of the year, is being impacted by run-off of both sediment from the current unpaved parking lot and from toxic urban waste from the downtown area. In order to properly evaluate potential future impacts, and to ensure that the pollution is reduced and the estuary protected, the project must be reviewed in its entirety.

Because of the potential impacts, both aesthetic and environmental, which are not fully mitigated in the current project proposal, a Negative Declaration is not appropriate.

When a complete application is received which discloses the entire project, then an Environmental Impact Report should be prepared to analyze the numerous potential significant impacts of the project. The Report should consider the permanent harm to the natural beauty of the Gualala bluff that would be caused by the proposed wall, and fully consider less harmful alternatives. The Report should include an independent engineering review of the justification for and possible alternatives to the proposed retaining wall.

The current application, CDP 55-2006, should be **denied**.

Sincerely,
John Holland
President
Friends of the Gualala River

cc:
J. David Colfax
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Ukiah, CA 95482

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