



Friends of the Gualala River

PO Box 1543 Gualala, CA 95445 707-785-3431 www.gualalariver.org

CalFire
Forest Practice Program
135 Ridgeway Avenue
Santa Rosa, CA 95401

Re: THP 1-07-067 MEN

Friends of the Gualala River (FoGR) submits the following comments on the above-referenced THP.

1. Visual impacts

Visual impacts of the proposed clear cuts are grossly understated in the THP. Contrary to the impression conveyed by the name Robinson *Terrace* (emphasis added) THP, large portions of the harvest area, including clear cut areas, are on a steep terrace break.

From the topographic and silviculture maps in the THP submittal, the northern clear cut area has a topographic relief of 30 meters ($\times 3.28 \text{ ft/m}$) = 98.4 feet. The slope exposure generally faces west and southwest, towards a cleared rise traversed by Highway One.

From the same THP submittal maps, the southern clear cut area contains a relief of 65 meters, or 213.2 feet. Slope exposure is directly south, across the Gualala River estuary and towards Gualala Point Regional Park. The park trail most proximate to the southern clear cut is approximately 2500 feet from the clear cut. Even a brief visit to the park shows that at least one, and most probably both, proposed clear cut areas are easily visible from the park.

Although Gualala Point Regional Park is not mentioned in the visual impacts discussion, its proximity (less than one-half mile), topography (on an elevated promontory directly facing the THP area, and with postcard-views of downtown Gualala), and popularity (recent verbal estimates from Sonoma County Parks staff indicate approximately 75,000 visitors annually), all suggest that this is a serious omission.

The current THP submittal should, at a minimum, contain a detailed GIS-based visual analysis, in which impacts to the Gualala Point Regional Park are fully considered.

2. Probable development of THP area.

The proposed THP area lies immediately adjacent to the center of Gualala. From the north to south, the proposed harvest area adjoins: a mobile home park, Redwood Coast



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Medical Services (a regional clinic), The Coast Life Support District (emergency medical response), the South Coast Volunteer Fire District headquarters, and the Baptist Church. Within a thousand feet of the harvest area lies the core of downtown Gualala, including Sundstrom Mall (the town's major shopping mall), Post Office, the Gualala Hotel, the Gualala Community Center, two gas stations, Mary Star of the Sea church, and Cypress Center – the area's newest shopping center.

Given the THP location as described in the preceding paragraph, and the fact that a significant portion of the THP is within a parcel zoned "GPD," (Gualala Planned Development), future residential and/or commercial development of the THP area is a given. Indeed, at a July 12 public meeting of the Gualala Municipal Advisory Council (GMAC), the public discussion generally assumed development. With development inevitably comes the potential for both chemical contamination and increased silt loading of the estuary.

Several excerpts (via handwritten notes) from the public discussion include: "...when you decide to convert the property to something more developable...", "...all this is going to blend in when it is developed...", "...we are already assuming development...", "...(there is) logical progression that it will be developed...", "...when the town comes to me for housing I see (the THP) as a smooth equitable means to jump in..."

FoGR hereby requests that CDF delay any approval of this THP until the approved minutes of the July 12 GMAC meeting can be submitted and be made part of the review process. To approve the THP in isolation of its unequivocal relation to urban development would be a serious error.

Respectfully submitted for Friends of the Gualala River

Michael Lane