



GUALALA MUNICIPAL ADVISORY COUNCIL

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CalFire - Forest Practice Program Manager

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November 15, 2015

SUBJECT: THP 1-15-042 SON ("Dogwood" THP)
THP 1-15-033 SON ("Apple" THP)

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Dear Cal Fire :

COAST AREA OFFICE
RESOURCE MANAGEMENT

The Gualala Municipal Advisory Council (GMAC) is concerned with the economic and environmental impacts of the two timber harvest plans ("Dogwood" and "Apple") in application from Gualala Redwoods Timber. The "Dogwood" THP is unprecedented in terms of the logging area size (320 acres) of mature (80-100 yr) redwood forest stands within the lower Gualala River floodplain. It is also unprecedented in terms of logging locations next to Sonoma County Regional Parks (campgrounds), and a private commercial campground, both with outstanding, important recreational and economic value for tourism.

The Timber Harvest Plans are also adjacent to the Gualala River Estuary within the Coastal Zone, an Environmentally Sensitive Habitat Area (ESHA) and exceptionally scenic segment of the river "within the lower Gualala River watershed". The Gualala River is designated as a Wild and Scenic River, which is essential to the environmentally-sensitive local tourism economy. The Mouth of the Gualala River watershed is the most heavily visited part of the watershed, and is also most important to the local tourism economy. The water of the Gualala River Watershed is in the public trust and therefore in the purview of GMAC.

GMAC would like the river to remain as it has been, a healthy part of the whole ecosystem that provides essential recreation and economic value to the Gualala area. The Sonoma County General Plan has previously included a large river parkland that would create a major destination for tourism, like Big River (Mendocino C.). This would include the heritage sport fishing industry that has existed for generations. Existing logging roads adjacent to the river could create other recreational activities such as hiking, cycling, camping and boating. To save this habitat now is a once in a lifetime chance to preserve some of the regenerated older trees that are so much a part of the parkland experience. Gualala has benefited from generations of people who have used this river and hope to share it with generations to come. There are conservation organizations waiting for the chance to create easements to allow the public access to our watershed. Many consider this area and watershed as unique,

and compare this land to National Park Land in its beauty and bounty of flora and fauna, which include several threatened species. The waters that flow into the Pacific Ocean are now part of the Greater Farallones National Marine Sanctuary and the Gualala River has been the spawning grounds for the Federally protected Coho (Silver) Salmon. Federally listed Steelhead trout also struggle towards recovery in the Gualala River, despite the extreme historic drought. Numbers of fish are substantially reduced and the drought-stressed ecology of the river is on the verge of collapse.

GMAC is specifically concerned with the impact on the floodplain areas, and also the economic impact on the community of Gualala. Past Timber Harvest Plan applications for floodplain logging have been denied due to the sensitive nature of riparian floodplain habitat. The cumulative effects of logging practices have already been documented by the U.S. Environmental Protection Agency (EPA), who have declared the river as impaired due to excess sedimentation and higher water temperatures. Sensitive floodplain areas have forest under-story vegetation that acts as a powerful filter for fine sediment, counteracting water quality impairment due to erosion. Skid roads and logging disturbances in the "Dogwood" THPs would significantly impair this critical ecosystem service.

As local residents who fish on the river know from years of direct experience, clear-cut logging on slopes next to the river in the "Apple" THP would cause significant sedimentation during extreme storm runoff events after logging. All trees add to the canopy of the river which in turn add to the ability to filter sunlight and reduce water temperatures. The THPs do not provide adequate mitigation against disturbance and loss of sediment-trapping capacity in the floodplain, or adequate erosion protection of disturbed logged slopes, exposed to extreme storm runoff.

The THPs also propose to draft 25,000 gallons per day from the river during the dry season, over 5 years. This is equivalent to approximately 250 Gualala household/visitor water hook-ups, with consumption of water at a drought-conservative 100 gallons per day, and 500 households at 50 gallons per day. This is unacceptable during extreme drought conditions. California Department of Fish and Wildlife has advised Mendocino County that permits for new Gualala water hook-ups should be suspended while the local North Gualala Water Company (NGWC) is pumping water from the river when flows fall below critical levels. The low flow river pumping has been the norm for the several years of drought. The THP area of "Dogwood" would degrade existing mature forest conditions for generations at locations critical for future economic vitality of Gualala's tourism economy.

GMAC has the following recommendations and requests to CALFIRE:

1. The "Dogwood" THP should be elevated to Sacramento CAL FIRE office for policy review regarding:
 - a.) Compliance with current Forest Protection Rules regarding disturbances in floodplain forests, aimed at protecting salmon and trout habitat.
 - b.) Impacts to sensitive habitats, estuary, park, campgrounds, recreational trails, and scenic river areas in the coastal zone
2. GMAC requests public hearings on the "Dogwood" and "Apple" THPs, chaired by CAL FIRE, and located in Gualala, with ample public notice, and invitations to the Mendocino County Board of Supervisors, GMAC, California Department of Fish and Wildlife, and

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North Coast Water Quality Control Board.

3. The "Dogwood" and "Apple" THPs should not be approved as proposed. Additional mitigation is needed to protect recreational values, parks, Coastal Zone fish and wildlife resources, Coastal Zone scenic views, Wild and Scenic river conditions, water quality, water supply, and estuary habitats that are vital to Gualala's tourism economy.

Sincerely,

(on file) *CFI*

Charles Ivor
GMAC Vice-Chairman

A handwritten signature in cursive script, appearing to read "Charles Ivor", written in dark ink.

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