

Dear CALFIRE THP Review Team,

The County of Sonoma has reviewed portions of THP 1-20-00084-SON “Silver Estates”, and offers the following comments on this THP:

Visual Impacts

The THP states that, after mitigation, there will be no cumulative impacts to visual resources as a result of the proposed project. The THP offers no mitigations to visual resource impacts, only a project silvicultural description and brief description of visual impacts, with no supporting evidence. Based on project maps, Group Selection Silviculture, which is characterized by removing trees in small group areas sized from one-quarter (0.25) acre to two and one-half (2.5) acres, is proposed in the Scenic Corridor of Highway 116. It is not clear from the THP if Group Selection openings are proposed that would be visible from publicly accessible areas. Such openings adjacent to or visible by the public would be a visual impact from a public area. Several County residents have submitted comments to CALFIRE regarding the existing degraded visual resources in the THP area, but these comments do not appear to have been considered by the RPF. The County requests that the RPF clearly identify in the THP and visual assessment where group openings will be visually observable from publicly accessible areas, eliminate group openings that are readily visible, and modify the THP’s visual impacts analysis accordingly.

CEQA Guidelines Appendix G, Question I.B. asks if projects will “*Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*”

The project is located in the corridor of State Scenic Highway 116. Recognizing the authority of the County of Sonoma in implementing the Goals and Objectives of the 1988 Final Report Of The Sonoma 116 Scenic Highway Corridor Study, the County is requesting a more in-depth assessment of visual resources be completed by the RPF to document visual impacts of the proposed project harvesting methods and the cumulative impacts of harvesting outcomes. For guidance in preparing an assessment of scenic impacts from the proposed project, the County recommends the guidelines established by CALTRANS for Scenic Resource Evaluations, found at <https://dot.ca.gov/programs/environmental-analysis/standard-environmental-reference-ser/volume-1-guidance-for-compliance/ch-27-visual-aesthetics-review>

Due to the significance of the visual resource in the Scenic Highway Corridor, the County requests that a visual assessment be prepared by a qualified professional with experience in analyzing visual and aesthetic impacts. The impacts of timber operations and the selected silvicultural methods and retention levels should be analyzed in light of impacts to the scenic resource.

Clar Tree Buffer Zone

The THP currently proposes a 75-foot buffer around the Clar tree. The CDFW pre-consultation letter agrees with the 75-foot buffer proposed by the RPF, citing benefits including protecting the tree from wind damage, protection from predators for wildlife species utilizing the habitat,



and avoidance of incidental harvest operations damage to screen trees and overlapping canopy trees (page 321). These considerations focus on above-ground impacts from harvesting. The pre-consultation letter from CDFW does not address below-ground impacts from harvest operations to the root system of the Clar tree and surrounding redwood forest. Consultation with Dr Dawson of UC Berkeley suggests that redwood roots and their below ground fungal relationships often expand further than the tree's height. The disturbance to the Clar tree's root system outside of the proposed buffer is not analyzed in the THP's cumulative impacts. It is not reported in the THP how timber harvesting activities outside of the buffer zone would impact the mycorrhizal relationship between soil-dwelling fungi and the tree's roots.

The County requests an expanded buffer to at least the height of the Clar tree or a scientific justification of the efficacy of the scientific buffer.

Thank you for your consideration,

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