Chuck Eyerly	Sally Grigg	Bill Knapp	Thad Van Bueren	Judith Vidaver	Robert Scott
Secretary	Director	Treasurer	Chair	Vice-Chair	Alternate



Westport Municipal Advisory Council P. O. Box 307, Westport, CA 95488 www.westportmac.org

March 7, 2012

Forest Practice Program Manager California Dept. of Forestry & Fire Protection 135 Ridgway Ave Santa Rosa, CA 95401

Re: THP 1-11-101-MEN (Denoyer) in the Howard Creek watershed

Dear Forest Practice Program Manager:

The WMAC previously commented on the cited THP in a letter dated December 7, 2011. At that time we shared with Calfire public concerns regarding ground-based yarding and inadequate retention of tree cover that may exacerbate sediment flows into Howard Creek. There was also widespread concern about traffic and degradation of a shared use road (Howard Creek Road). We received additional public input on the recirculated THP from five neighboring landowners. Although the revised plan makes minor adjustments, the public feels their core concerns have been ignored. We urge Calfire to exercise its regulatory discretion to require meaningful plan modifications addressing these matters:

- 1. Please require a harvest method such as cable yarding that will cause less disturbance than ground-based yarding. The plan area is very steep with high erosion potential. Environmental impacts should be given greater weight than the cost of the harvest method.
- 2. Please require higher stocking levels to reduce the risk of blow downs and resulting erosion from thinned stands. The canyon channels winter wind directly east onto this plan area.
- 3. Please reject winter operations. Provisions made to avoid runoff do not provide confidence that erosion will be controlled on the very steep bare earth roads in the plan area.
- 4. There is no water quality report, which should be used to refine the plan operations. More wet weather monitoring would be desirable to address erosion issues that may arise.
- 5. The cumulative impact discussion does not consider past impacts from timberland conversion for a large horse breeding operation. Mitigation of residual impacts is desirable.
- 6. Neighbors could find no stipulations in this plan for use of Howard Creek Road, a shared-use facility that will be impacted by trucking/equipment passage. Traffic safety (speed limits, advance notice, time-of-use restrictions); dust suppression; and road maintenance before, during, and after planned operations should be explicitly addressed.

Sincerely,

Charles h. Eyely

Chuck Eyerly, Secretary