

7-19-22

Planning Commission Public Comments

Project: Mattole Camp and Retreat Center

Record Number: PLN-2021-17495

APN: 104-301-001

To Whom It May Concern,

I am writing with my concerns about the above-named project. I am the nearest property owner to this project.

This project is making an exception to the County's Streamside Management Areas and Wetlands Ordinance, by not adhering to the 100' setback required for new construction. The stream in question is the Mattole River, an impaired river system that manages to maintain a small population of coho salmon, chinook salmon, steelhead, lampreys, turtles, otters, martens, amphibians, and macroinvertebrates. Over 40 years of instream and upslope restoration efforts have occurred and continue to occur in or nearby the Mattole River. The Mattole River sister organizations, The Mattole Salmon Group, The Mattole Restoration Council and Sanctuary Forest lead the state in new science and technology pertaining to fisheries, hydrology, water forbearance agreements, in stream flow and fish monitoring, drought studies, large wood habitat and groundwater recharge projects. SMA's should be taken very seriously for the Mattole River. The projects existing site conditions include terrestrial, hydrologic, aquatic, sensitive species, and habitat considerations.

This project does not fall under 61.1.7.4 "minor additions," which allows exception to SMA standards. This is new construction. The proposed new construction increases in size the existing proposed demolished caretaker's residence and garage. Under no circumstances should new construction be allowed within the SMA.

Exemptions contained in Section 331-14(d)(2), Grading, Excavation, Erosion and Sedimentation Control do not apply in SMA's. New construction will require these elements that are not exempt.

61.1.7.6.3.1 The SMA may be reduced where the County determines that the reduction will not significantly affect the biological resources of the SMA on the property. I disagree. New construction will produce a myriad of environmental impacts during and after construction. I do not see in the documents that 61.1.10.1.5-1.9 Erosion Control Measures & Concentrated Runoff Controls will be implemented, as required.

Regarding the demolition aspect of this project, 61.1.11 & 61.1.11.1.2 Prohibited Activities pertain to all development and related activities within SMA's within the County. I do not see where these prohibited activities are addressed or mitigated in the documents. Of course, demolition will require the discharge and placement of organic and inorganic material into the SMA, in quantities deleterious to fish and wildlife. This includes hazardous building materials from decades ago. I assume there is a septic line from the old structure to the septic tank. When demolition occurs the disconnection of this line, and other lines, for instance propane, need to be handled with care and caution, as to not allow pollutants into the Mattole River.

61.1.15 Project Monitoring, Security and Certificate of Completion must be made as conditions of the project. The demolition aspect of this project needs the above met conditions as the two structures to be demolished are literally hanging off the bank of the Mattole River. I have seen a family of otters directly below these fire damaged, dilapidated buildings.

I do not see anywhere in the document that the septic system has been reviewed and appraised for the current numbers of camp attendees and the addition of a new caretaker residence. I also do not see the distance of the septic tank from the Mattole River. This should also be reviewed.

I understand construction practices and policies, or lack thereof, when building occurred 40 or more years ago. However, moving forward, all new construction must adhere to the 100' setback. These policies were established for a reason and should not be ignored.

To summarize, I do not oppose the Mattole Camps plans to build a new caretaker residence and garage. I do oppose it occurring within the SMA. I do expect the construction and demolition effects to the site and surroundings to follow SMA ordinances. The Mattole Camp has enough acreage to allow for new construction outside of the SMA. Now is a good time to review the Mattole Camps' septic system capacity and proximity to the river. The demolition of the existing structures needs reliable monitoring and oversight to protect the resources of the Mattole River. The least environmentally damaging option is to adhere to the 100' SMA setbacks.

Thanks for your time and consideration in this matter,

Linda Yonts