

**Mr. Frank Demling, Project Manager**  
**Caltrans – District 1, Eureka**

Aug. 21, 2020

Frank,

Thanks again for the hour-plus you spent on Zoom with Nephele Barrett of MCOG and us on Wednesday. As we explained, we're very concerned about the extent of the current plans for the virtual Town Hall regarding the long-planned Highway 1 project in downtown Gualala. Our conversation left us with significant new concerns about whether all the residents of Gualala will be invited to the upcoming virtual Town Hall, and whether the invitation will include our Mendocino County neighbors to the North as well as our Sonoma County neighbors to the South. Currently, it appears that most of our town's residents and thousands of other Mendocino County residents will be at a distinct disadvantage.

We understand this process is currently being finalized by your staff, so we wanted to clearly state our concerns before that happens. A deficient process would not only reflect badly on MCOG and Caltrans, but could very easily leave the good people of Gualala with a Main Street that doesn't match their expectations or needs. As noted in our call, Tom Murphy has professional experience in designing consumer surveys as a consultant to Global 1000 companies and would volunteer time if you'd like to help assure proper sampling and to minimize data corruption due to background marketing efforts.

It's apparent to both of us as long-time residents and members of the Gualala Community Action Plan Committee (of the Gualala Municipal Advisory Council - GMAC) that the 2019 physical Town Hall results were skewed by a professional marketing campaign launched by one downtown merchant who has a personal financial interest. As you know, that was among the 10 key findings of our committee as reported to you and our full council on Aug. 6. That helps explain why the Town Hall's call for a four-lane roadway with no landscaping but two lanes of parking contrasted so dramatically with the informational survey GMAC conducted days earlier. The GMAC survey found an 89% preference for a three-lane project with landscaping that removed on-highway parking as legally required in the Gualala Town Plan. The GMAC survey matched the results of the 2018 Town Hall you led in Gualala, and was consistent with the prior 17 years of planning and negotiations. The 2019 Town Hall went 180 degrees the other way.

The more positive side of this letter is that we were very impressed with the potential of the LandVision tool you demonstrated. Clearly, it could help sort out full-time residents from empty lots, and full-time renters from short-term vacationers. (We also think the opinions of short-term vacationers should be considered through a *separate sentiment analysis* conducted by Visit Mendocino or another group that may have already sampled their views.) It is a fair guesstimate that most tourists visit the area because of the natural environment and that they would favor a downtown atmosphere that reflects that. That would be in line with what local hotel owners told us in the spring through a survey conducted by the GMAC Housing & Economic Development Committee.

However, we believe the design must give the highest priority to those permanent residents who rely on the highway every day to get to work, take their kids to school, run down to the Post Office, operate consumer-facing businesses, or shop in Gualala – a major service hub that draws thousands of full-time residents from Manchester in the North to Annapolis in the South.

While, as Nephele noted "vacant land owners should have an equal level of participation," we agree with you that there should be a weighting mechanism that gives full-time community members a much greater say in how the highway appears and operates.

We are attaching a list of other concerns and suggestions that we hope will speed you in your work.

Frank, we truly appreciate the time you're investing personally in this project. As unpaid volunteers, we have spent hundreds of hours attending meetings, speaking with our neighbors, hosting roundtables with business owners, and conducting due diligence on this issue. And we are not the first volunteers to do so. For a quarter-century, hundreds of Gualalans before us have contributed to negotiations, drafting sessions, town halls, and other efforts that led to the Gualala Town Plan and subsequent modifications to ensure the highway project is completed as required by law. We are just the latest to share this responsibility, and we approach it solemnly as part of our sworn duty to do so. Accordingly, we are obliged to challenge efforts to change our Town Plan without a thorough and reliable community review process that extends well beyond any one town hall.

We will eagerly work with you, Caltrans and MCOG to refine the data collection effort. We know that a good process will result in good data and a better project. We also know that a flawed process will lead to unreliable data that could result in continued conflict, doubt in our community, or worse – a project that actually harms the economy and environment of our community. Like you, we are eager to get this right as simply as possible.

Thank you again for your interest and your best efforts,

Sincerely,

*Robert Juengling*

Tom Murphy

Robert Juengling, Chair, Gualala Municipal Advisory Council  
Tom Murphy, Vice Chair, Gualala Municipal Advisory Council

cc: Nephele Barrett, Brad Mettam, Richie Wasserman, Ted Williams, GMAC Members

Attachment: Comments and Maps of Central Gualala and its Extended Community

**Concerns and Suggestions on the Upcoming Town Hall on the Gualala Hwy 1 Project**

*Submitted to Frank Demling, Project Manager, Caltrans District 1, on 8/21/2020 by Robert Juengling,*

*Chair, and Tom Murphy, Vice Chair, Gualala Municipal Advisory Council on behalf of the GMAC Gualala Community Action Plan Committee.*

Here are some specific concerns about the upcoming Town Hall and our suggestions to resolve them. We intend to share this thinking with our council at its next meeting, 6 pm Sept. 3. You and Nephele Barrett are always welcome to attend. (If you wish to do so, please advise us at least one week in advance so we can add that to our agenda.)

**1. Gualala's Residents (Fig 1):** You showed us on LandVision that you were thinking about sending notifications to residents along the highway for approximately 1 mile from Old Stage Rd. to the Bedrock plant at Robinson Reef Dr. You also said you'd include homes within 1 mile of the project area. That zone, however, would exclude the vast majority of the residents of Gualala who live in hundreds of homes along Old Stage Rd. on the ridge and the upper end of Pacific Woods Rd. We estimate about two-thirds of our residents who drive through town every day would receive no notification of this critical Town Hall.

One example: There are scores of homes in the Ocean Ridge subdivision where hundreds of Gualalans live full time. However, the northern reach of that neighborhood is 3.8 miles from the Gualala Hotel. Indeed, any part of Old Stage Rd. on the ridge above Gualala is also over 1 mile from the Project Zone.

**2. Extended Community (Fig 2):** You (and Nephele) spoke of sending meeting notifications to every vacant lot, permanent resident, property owner, and renter on The Sea Ranch, which extends approximately 10 miles south from the Gualala Hotel (as the crow flies) and about a half-mile inland. We know there are 2,288 parcels in that roughly 5-square mile area, including several hundred vacant lots. The TSR community manager and security chief tell us that 689 homes (37.9% of completed homes) are occupied on Sea Ranch as of the 2010 census (up just 0.2% from 2000). They estimate roughly 400 homes in the rental market, but many are vacation rentals for 3-4-day stays.

Though it is sparsely populated, The Sea Ranch includes restaurants, an inn, a large hardware/home supply/nursery store, an airport, realtors, first responder stations, an administration center, therapists, and other business services. There is also a small market/bakery just to the south at Stewarts Point. Please note the first turn into The Sea Ranch (Leeward) is 1.6 miles south of the Gualala Hotel; the subdivision winds south for miles along Highway 1 from there.

Though you would include ALL of The Sea Ranch, you proposed limiting post card notifications in Gualala to less than 1.5 square miles along either side of the highway, an area that is largely commercial or dedicated to hospitality businesses that have no permanent residents. Most of that area is owned by a single landowner. Aside from a 12-condo development and mobile home park, there are only a few dozen private homes on the northern end of that zone.

If the extended community of Gualala includes all of the Sea Ranch to the South, we believe it must also include populated areas to the north that rely on Gualala for services like supermarkets, gas stations, the Redwood Coast Medical Services, houses of worship, and other daily needs. That northern area extends 16 miles north to Manchester. That includes Anchor Bay (residential area 3 miles north of Gualala), Point Arena (13 miles), and Manchester. Much like Sea Ranch, each town has a small market and some other small businesses, but there are thousands of full-time residents and business owners who rely on Gualala as their major service center. Point Arena is also where children from Gualala attend school and where Gualalans can find the closest pharmacy. It is a major part of our extended community.

**3. Local Media:** We believe your program is putting far too much faith in the ability of local media (newspapers and radio) to notify residents about the Town Hall. In reality, fewer people listen to radio these days and reception here is spotty at best. There is also a great diversity in what residents may listen to when they do. Even in the project area, some homes get KZYX from Philo clearly, but may not receive Gualala stations (KGUA, KTYD) as well. Some listen to San Francisco stations.

As for newspapers, there are two: the Independent Coast Observer in Gualala, which publishes a print edition for paid subscribers, but has no online access for non-subscribers, and the Lighthouse Peddler, which distributes smaller number of copies monthly through local markets. There would be large overlap

between their reach and the people who would receive post cards; many ICO subscribers are Sea Ranchers and copies of the monthly Peddler are found in stores in the project area.

Nephele suggested residents may learn of the hearing through word of mouth, but it is highly unlikely they will get the complex information they need to attend the Town Hall in that manner, if they hear about it at all. This leaves them at a striking disadvantage to the Sea Ranch area that would be blanketed by post card notifications.

One other note: Annapolis, about 9 miles to our southwest, also has many full-time residents who rely on Gualala for services. It is closer than the farther reaches of Sea Ranch and names (and addresses) of residents can be found on the 2019 GMAC survey of highway preferences. It is as much a part of our extended community as any part of Sea Ranch.

**4. Survey Control:** Will the post card notifications contain an Internet link to the Town Hall? If so, what is to prevent a sophisticated marketing effort from distributing that link to thousands of people nationwide? In today's world, each time consumers use a credit card, a merchant can obtain their email information. In 2019, we saw a local merchant use bulk emails, social media ads, a national petition, and other sophisticated marketing tools to generate significant opposition to the Caltrans proposal that was on the table. On Sept. 30, you notified us that this group was planning to bring 200 supporters to the Oct. 1 Town Hall in a venue that holds only 235 people. That turned out to be true, leading to a raucous session that we believe created a badly distorted view of community sentiment.

Imagine what the online Town Hall would be like if similar marketing tactics were applied to distribute an electronic link. For this reason, we believe those invited to the virtual Town Hall should be pre-registered based on the information used for notification so that only those qualified in advance would be able to express preferences. (See discussion of registered forms under No. 6 below.)

**5. Survey Content:** Many of those attending the Oct. 1 Town Hall found the handouts to be very confusing. Diagrams weren't marked. The document began with a turgid history of the project. And, in our opinion, the statements failed to adequately explain the legal mandate of the Gualala Town Plan, which is a portion of the Mendocino County General Plan, Local Coastal Plan and Mendocino County Zoning Code. Another of our committee's recent findings was that the alternative that came out of the 2019 Town Hall (Caltrans Alt 3) contradicts the Town Plan and did not qualify for an exclusion under the specific language of the code. (The Alt 3 alternative may be rejected because it would require massive retaining walls that aren't acceptable to either Caltrans or the residents of Gualala.)

We realize that the average person often finds communications from state agencies to be obtuse. We request the issues be explained in clear, simple language, so that our residents will easily comprehend the law behind the Town Plan and the project options laid before them. We believe those options should be consistent with the Town Plan, or at least allow a clear path to comply with the Town Plan. That did not happen in 2019.

**6. Digital Divide / Three-step Alternative:** You correctly noted that many of the people in our (extended) community may be unable to attend the virtual Town Hall. This is due to a lack of proper computer equipment, broadband access, and/or technical skills. Many do not even have cellular service. The alternative for them – if they somehow found out about the Town Hall – would be to contact Caltrans and ask that the materials be sent by mail, then study the materials, note their preferences and mail their form back to Caltrans. This cumbersome process in itself constitutes a major source of bias.

More-affluent people across the country who have better computers and more time to attend a Town Hall would have a much louder voice than local residents who live in the digital divide. These local residents would face the more complex and time-consuming process, leaving them behind.

**Fig 1: Gualala Residential Core**

To compensate for this bias, the best solution might be to use the virtual town hall ONLY as an informational opportunity to show and explain alternatives for the project, then ask EVERYONE to use a registered form distributed with the notifications to express their preferences. If everyone – both online and offline – start with the same, registered preference card, then the outcome would be more balanced. Granted, there would not be an immediate tally visible to all at the virtual Town Hall, but the integrity of the data would be far more reliable. It would also give Caltrans time to weigh the various responses based on type of stakeholder, distance from project, frequency of highway use, etc.

We stress, that any “ballots” sent out in advance must be registered so that the potential for fraud is controlled. The forms could be numbered, marked with the names of the intended party, or otherwise tagged. They could be scanner friendly to simplify the tally once they are returned to Caltrans.

**Fig 2: Gualala Extended Community**

