



Friends of the Gualala River

An affiliate of the Redwood Coast Watersheds Alliance

P.O. Box 1543, Gualala, CA 95445 GualalaRiver.org



February 15, 2012

SUBJECT: “Fairfax” timber conversion project, Annapolis, Sonoma County Final Environmental Impact Report certification schedule and public comment request, SCH 2004082094

Dear Mr. Hall,

CALFIRE announced on February 9, 2012 that it was issuing the Final Environmental Impact Report (FEIR) for the Fairfax/Artesa Forestland Conversion Project for certification within 10 days, with no public comment.

Friends of the Gualala River, and over 1,000 petitioners as of today’s date, gathered after the date of FEIR release, are requesting that you suspend the date of certification and open the FEIR for public comment. The vast majority of these petitioners are California residents. Public comments on the final EIR are fully justified in this case. Please review the petition attached to this letter, and the website:

<http://www.change.org/petitions/stop-clear-cutting-redwoods-to-plant-vineyards>. We believe this is an unprecedented level of public demand for public comment on any CAL FIRE environmental document, and fully deserves to be heeded.

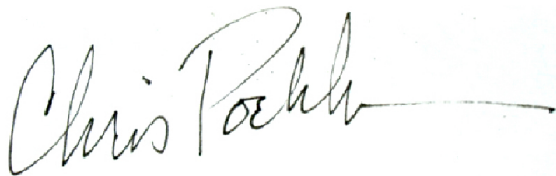
There is substantial evidence, including expert opinion and the views of affected Pomo and Miwok tribes, that the FEIR’s conclusions about native American cultural heritage and archaeological resources remain inaccurately represented, despite the recirculated Draft EIR. The FEIR’s analysis and conclusions are inadequate and outdated regarding off-site alternatives that may substantially lessen or avoid significant impacts. But the changed circumstances that most directly affect the FEIR are due to the Sonoma Board of Supervisors who this month approved a **four month moratorium on tree removal for vineyard conversion**, and who have directed the County Agricultural Commissioner to draft an ordinance that is directly aimed at the regulation and impacts of tree removal on county lands

http://www.sonomacounty.org/agcomm/pdf/ordinance_final.pdf .

The four-month moratorium was prompted by a wave of new vineyard projects and a need to update 12-year-old farming regulations that don't deal with tree removal, according to County officials. County Agricultural Commissioner Tony Linegar called that loophole a “deficiency” in the current rules -- environmental reasons that must be at the heart of the FEIR’s analysis, particularly of land use policy impacts. **The FEIR has not considered any of these important contemporary county land use policies or the reasons for them.** To keep the FEIR closed to public and agency comment, and to certify the FEIR without consideration of these dramatic, significant changes of circumstances, would be arbitrary and contrary to the basic purposes of CEQA.

As a public agency, CAL FIRE must comply with CEQA's substantive mandate to refrain from approving projects with significant environmental impacts when feasible alternatives can substantially lessen or avoid them. We urge you not to abuse your discretion by proceeding with certification of the FEIR without necessary and justified public comment to address, at minimum, highly relevant changes in alternatives, tribal policy, and County land use policy.

Sincerely,

A handwritten signature in black ink that reads "Chris Poehlmann". The signature is written in a cursive style with a long horizontal line extending to the right.

Chris Poehlmann, President
Friends of the Gualala River

cc:

Sen. Noreen Evans

Hon. Lynn Woolsey

Emilio Valencia, Kashia Band of Pomo Indians of Stewarts Point Rancheria

Susan Moore, Federated Indians of Graton Rancheria

Jay Halcomb, Sierra Club

Justin Augustine, Center for Biological Diversity

George Torgun, EarthJustice

Interested Parties