

October 31, 2006

Mr. Allen Robertson, Deputy Chief for Environmental Protection
California department of Forestry and fire Protection
PO Box 944246
Sacramento, CA 94244-2460

Re: ANNAPOLIS TIMBERLAND CONVERSIONS PROJECT
ENVIRONMENTAL IMPACT REPORT (EIR) SCOPING MEETING

These comments are submitted for the EIR scoping process, and following the public meeting held October 19, 2006, in Annapolis CA. In addition to comments specific to the EIR scope, I have two concerns regarding the public meeting.

1 - We were informed several times that the meeting was being recorded, and that the tape would be the primary record of the public comments. Apparently, no transcript will be prepared. At the meeting, no microphone was provided, and at no time were commenters reminded to speak up so that an accurate taped record of comments be obtained. Several commenters were soft-spoken, and/or were distant from the recorder. It is unlikely that an accurate and complete taped record was obtained.

2 - One of the stated purposes of the meeting was to inform the public about the CEQA process. The "flow chart" used by the consultants for that part of the presentation was unreadable from virtually all areas where the public was seated. No handouts of the chart were provided. This was not effective public information and communication.

The following comments are arranged in the same order as the Notice of Preparation

PROJECT DESCRIPTION

Project Location and Setting

The occurrence of two projects "within the same watershed" and "approximately 4,000 feet apart" are cited as justifying a combined EIR. The Gualala River watershed contains a complex array of soils, topography and geology. A separation distance of nearly a mile is not in and of itself justification for combining the projects. If in fact the projects are not separated, the rationale for combining them needs to be much better explained.

Roessler

The NOP states that "...slopes range from three to 60 percent with an average of 27 percent across the site." Given this highly dissected and variable topography, an average slope is not informative and does not reflect actual site conditions.

Martin

The NOP states that after vineyards and living quarters, "...28 acres would be placed in a conservation easement..." This seems speculative and irrelevant at present.

ENVIRONMENTAL EFFECTS

The NOP states that non-technical environmental issues such as housing, public services and traffic will be addressed in the Initial Study. There is no detail provided either in the NOP or the Public Meeting regarding how these issues are to be addressed. One of the consultants stated that due to "the nature of the project area....less attention would be paid".....(to Initial Study issues).

The relegation of such issues as public services (fire protection, medical services for example) and traffic to the Initial Study, effectively precludes the public from commenting on protocols or study scope.

Regarding fire, the proposed projects occur in a remote area with high fire risk and thinly stretched fire fighting personnel and equipment. Vineyard operations are a known source of wildland fires in this area. A fire-risk assessment of the entire project area needs to be included in the body of the EIR. The study should include cumulative impacts both from the current proposed projects and from other planned development in the region. All are relevant to fire risk.

Regarding traffic, site access is via narrow (often one lane) twisting uneven roads, often with large drop-off and no guard rails. I have had numerous near-misses from meeting large trucks and/or speeding vineyard workers on narrow road segments. Virtually all local residents have had similar experiences. Any project which adds to numbers of vehicles and truck traffic places local residents in jeopardy. This is a serious health and safety issue which is inappropriate for a simple "checklist" approach. A traffic analysis which includes cumulative traffic impacts from the current proposed and other planned development projects should be included in the body of the EIR.

Geology and Soils

California Geological Survey (CGS) studies on the Gualala River Watershed should be included in any assessment of landslide hazards. Additionally, the United States Geological Survey (USGS) should be consulted in order to obtain current relevant information.

Hydrology and Water Quality

The NOP identifies a list of topics to be included in the EIR, including "...irrigation drainage, stormwater drainage, flooding, groundwater, seepage and water quality....In addition, the Hydrology and Water Quality Chapter will further address the issue of water

supply.” Given the seasonal nature of many of the listed potential adverse impacts, the EIR should be based on data from, at a minimum, one complete seasonal cycle. Local residents should be contacted in order to obtain baseline information on domestic water wells. In the event that agency water well records are not used, a copy of the written request for this information, and the written reply, should be included in the EIR.

The water quality discussion should include realistic estimates of loading. All chemicals reasonably utilized in vineyard operations should be included. The cumulative impacts from the current project and from other planned development should be addressed. Additionally, water supplies of special concern (schools, community water wells) should be identified and potential threats to water quality and quantity discussed in detail.

Thank you for the opportunity to submit these comments

Michael Lane
PO Box 904
Gualala, CA 95445

Friends of the Gualala River