



Sierra Club  
Redwood Chapter  
PO Box 466  
Santa Rosa, CA 95402

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August 9, 2004

Allen S. Robertson  
Deputy Chief, Environmental Protection  
California Department of Forestry and Fire Protection  
P.O. Box 944246  
1416 9th Street, Room 1516-24  
Sacramento, CA 94244-2460

**Re: Negative Declaration for Campbell Timberland Conversion  
(THP 1-00-147 SON, TCP 00-469)**

Dear Mr. Robertson,

The Sierra Club Redwood Chapter is concerned that the Campbell timberland conversion project (TCP 00-469) will create significant adverse environmental impacts, even as mitigated.

The applicants have not fully addressed the concerns expressed by the Sierra Club in our letter dated July 14, 2001. In addition, we share the concerns raised in more recent letters by Dr. Peter Baye (August 2, 2004) and Friends of the Gualala River (August 3, 2004) about the significant impacts that this and other conversions pose for water quality and quantity, anadromous fisheries, forest biodiversity, and other resource values in the Gualala River watershed. We urge you to carefully review the concerns identified in those letters and their attachments.

CEQA calls for use of the best available scientific information. Therefore the information on similar nearby projects prepared by Peter Baye, Don Erman, Patrick Higgins, Dennis Jackson, Michael Johnson, Greg Kamman and others must be considered in the review of the Campbell project. Note in particular that the comments on the Martin (1-04-059 SON) and Artesa (1-01-171 SON) projects attached to the letter from Friends of the Gualala River are highly relevant to the Campbell project, and need to be fully considered in a proper cumulative impacts assessment.

The Campbell, Martin and Artesa forestland-to-vineyard conversion projects are all within the Gualala River watershed, less than a mile apart, with similar climate, geography, soil, flora and fauna. Campbell and Artesa are similar in size (Campbell proposes to destroy just under 100 acres of forest; Artesa's proposed deforestation is just over 100 acres), and both drain at least partly into Grasshopper Creek, a Class I stream supporting steelhead.

Human activities have resulted in excess sediment, high temperatures and reduced summer surface flows in the Gualala River and its tributaries, impairing the habitat of once thriving salmonids, which are now threatened with extinction. The Campbell project as currently proposed, in combination with other similar projects in the area, would contribute to the cumulative impact of this on-going destruction of salmonid habitat.

*“This timber harvest and conversion, in combination with others already permitted, are highly likely to negatively impact recovery prospects for coho salmon and steelhead in the basin and will help continue the trend toward increased sediment, increased water temperatures and decreased surface flows. Ultimately the entire aquatic community of the Gualala is at risk from such activities...”*

– Patrick Higgins, consulting fisheries biologist, in comments dated July 17, 2004 on the Martin project, attached to the August 3, 2004 letter from Friends of the Gualala River concerning the Campbell project.

Applicants have not shown that they can obtain an adequate water supply for irrigation of their proposed vineyards without causing adverse environmental impacts. Aquifer depletion, stream diversions and surface water interception all threaten the water supply in the already water-scarce Annapolis area. Changes in stream flow as well as increased sedimentation further threaten the already depleted salmonids. Hydrologists Jackson and Kamman address these issues in detail in their comments on the Artesa and Martin projects (also attached to the August 3, 2004 letter from Friends of the Gualala River). These same issues apply to the similar and nearby Campbell project, and must be taken into account in considering its environmental impacts.

Given the many unanswered questions and concerns about this project, and the significant cumulative environmental impacts that it clearly threatens, a Negative Declaration is not appropriate. An Environmental Impact Report (EIR) must be prepared in order that potential impacts may be more fully evaluated and significant adverse impacts avoided. The Sierra Club Redwood Chapter urges the California Department of Forestry to require an EIR for this project.

Sincerely,

Peter Ashcroft  
Conservation Chair  
Redwood Chapter  
Sierra Club

cc: Trent Orr, Earthjustice