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Northern Region Headquarters
California Department of Forestry
135 Ridgeway Avenue
Santa Rosa, California 95401

RE: THP/TCP 1-04-055 Roessler ZAPAR
DATE: August 16, 2004

Dear Mr. Robertson and Ms. Markham:

Please add the attached documents as expert testimony to the above file:

Patrick Higgins letter to Allen Robertson, April 14, 2004, re THP 1-04-030SON Neg Dec
Patrick Higgins letter to Allen Robertson, July 17, 2004, re THP 1-04-059 Martin
Kamman Hydrology and Engineering letter to Allen Robertson, July 17, 2004 re THP 1-04-059SON
Dennis Jackson letter to Allen Robertson, July 19, 2004 re THP 1-04-059SON

In addition to the Roessler project, two other forest-to-vineyard conversions on Brushy Ridge groundwater recharge area in Annapolis are currently seeking approval from CDF. Those are 1-04-030 (Whistler Hansen) and 1-04-059 (Martin Sleepy Hollow) That these three conversions are likely to have significant environmental impact has been demonstrated in the above expert studies.

These three conversions, within $\frac{3}{4}$ mile of each other, are virtually the same with regard to the following conditions:

- Silvaculture (clearcut)
- Soil type and erodibility
- Drainage into Little Creek
- Vegetation type
- Location on the same groundwater recharge ridge
- Elevation
- Climatological factors
 - Precipitation (both rain and fog drip)
 - Temperature
 - Wind
 - Frost

Therefore, the scientific data and conclusions developed by these scientists for one Plan, with regard to the above factors, are applicable to all.

The following state agency letters for 1-04-030 describe environmental issues on that Project which are also significant to 1-04-055. In addition to the factors listed above, commercial traffic from these two projects use the same privately owned and maintained unpaved residential road system and 8' wide bridge.

Notwithstanding the "Traffic Impact Analysis"¹ put forth for 1-04-030 with its preposterous conclusion that a commercial logging and vineyard operation employing equipment of 5-80 tons has no more impact on the road than does a weekend residential visitor in a passenger car, neither 1-04-030 or 1-04-055 has shown that their proposals will not exacerbate poor road conditions and that there will not be increased risk of delivering additional sediment into Little Creek in the reasonably foreseeable future.

I would like also to add to the Roessler ZAPAR file the following letters from Department of Fish and Game re THP 1-04-030:

Robert Floerke, DFG to Leslie Markham, CDF July 27, 2004 Additional comments on Hansen/Whistler THP

Robert Floerke, DFG to Leslie Marham, CDF May 4, 2004 PHI report for the Hansen/Whistler THP

Also attached is the following letter from California Regional Water Quality Control Board:

Jim Burke, NCQCB, to Christine Wright-Shacklett, NCWQCB, April 29, 2004 re PHI, THP1004-030

The concerns expressed in these State agency letters remain unresolved by CDF.

CDF's streamlining and "integration" of these three Little Creek/ Brushy Ridge forest-to-vineyard proposals, as described to you in my letter of last April (also attached), has resulted in a hurried and harried perfunctory approval of the THPs and Neg Decs without due process attention to agency and public comments.

This Proposal, 1-04-055, may cause significant environmental impact, even with the proposed mitigations. As such, it should not be approved by CDF.

Sincerely,

Linda Haering
650 Karen Way
Santa Rosa, California 95404

¹ Niel Fischer to CDF, May 13, 2004 letter re: "Responses to Pre-Harvest Inspection Recommendations."