



# Friends of the Gualala River

PO Box 1543, Gualala, CA 95445

[www.gualalariver.org](http://www.gualalariver.org)

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Allen Robertson  
California Department of Forestry  
P.O. Box 944246  
1416 9th St.  
Sacramento, California 94244-2460  
<mailto:SacramentoPublicComment@fire.ca.gov>

SUBJECT: “Annapolis Area Timberland Conversions Project” (Roessler-Martin TCP joint Environmental Impact Report, Sonoma County).

The following comments are submitted by Friends of the Gualala River (FoGR) in response to the Notice of Preparation (NOP) for the Draft Environmental Impact Report (EIR) now in preparation for two Timber Conversion Plans (TCPs) at two sites in Annapolis, Sonoma County (Roessler, APN 122-090-008; Martin, APN 122-190-007). Please place this letter in the administrative record.

The applications for the subject timberland conversions are forerunners of an avalanche of applications that would transform hundreds, perhaps thousands, of acres of Annapolis area timberlands into what one Annapolis vineyard owner has characterized as “the Pinot Noir capital of the world.” Clearly then, these two initial conversions must be thoroughly scrutinized for their impact on the Annapolis area and on the Gualala River watershed. Friends of the Gualala River (FoGR) is especially concerned that the EIR show that there will be no adverse impacts on the watershed.

Not only must the EIR consider the impacts from the subject conversions, but also must it consider the cumulative effects of existing conversions, these two conversions, other planned and announced conversions, and unannounced conversions that might reasonably be expected in the event that vineyard conversion proves as profitable as its proponents suggest.

The Gualala River is listed as an impaired river under 303(d) of the Clean Water Act. Costly time and energy have been and are being expended by governmental agencies and watershed stakeholders to restore this River, its watershed, and its endangered species. The EIR should estimate the adverse impacts of upslope vineyards on the survival of struggling Salmonid populations.

The Gualala River is already suffering degradation of habitat because of sedimentation and temperature increase caused by logging. The EIR must estimate the further degradation that could occur because of the direct and cumulative effects of these, past, and future conversions.

The EIR must consider water quality for downstream users, the residents of Gualala and The Sea Ranch, which could be degraded because of the use of pesticides.

The loss of forestland in the Gualala River watershed has progressed under THPs which claimed the environmental effects under any single THP would be “negligible” or “imperceptible.” Yet these effects have left us with a sedimentation- and temperature-impaired River. The EIR must show the impacts of vineyard conversions that seem likely to exacerbate these problems.

Habitat fragmentation is a result of the unmanaged piecemeal nature of the clearcuts and vineyard conversions already approved by CDF. Irreplaceable ecosystems have been destroyed by this steady encroachment. Habitat is lost and ancient migration routes and food sources are permanently interrupted. The EIR must show the effects that the conversions will have regarding loss and fragmentation of habitat.

The high fences that are erected to “protect” vineyards prevent access to streams, rivers, and other water and food sources to terrestrial wildlife. The land is clear cut, the remaining living stumps with their irreplaceable genetic adaptations are ripped out, and the land is plowed in furrows to prepare it for a land preparation and vineyard management program based on intensive use of pesticides. These environmental degradations must be documented in the EIR and their cumulative impacts on wildlife estimated. The pesticides used in typical vineyard conversions are a threat to the local aquifer and local water supplies. In the case of conversions in the Annapolis area, they are likely to be a threat to the quality of the water supplied to the residents of The Sea Ranch and Gualala.

Water is scarce in the upper Gualala River watershed. Viticulture requires large amounts of water for irrigation, and also for frost control and delivery of pesticides and fertilizers. Quickly extracting large amounts of water from the watershed’s mountain aquifers is pose issues that must be analyzed in the EIR. The conversions attempting to avoid this by proposing to construct large reservoirs to catch runoff during the rainy season, a technique that may be used as deleterious to the watershed. The collected water, which today both helps recharge the local aquifers and helps the Gualala River recover from the effects of excessive logging, will never reach the downhill streams after the reservoirs are constructed. The River and its tributaries will not receive the peak winter flows needed to flush out accumulated sediment and debris; yet this is required if fish and wildlife habitat is to be restored. This is also likely to affect the quantity of water that The Sea Ranch is permitted to pump from South Fork Gualala River.

Every group that is environmentally aware understands that in addition to water quality, air quality has become in important issue in Sonoma County. The effects of vineyard conversions on air quality must be part of the EIR.

The EIR must consider impacts on

- water scarcity of the west county area
- the 303(d) Clean Water Act listings of the Gualala River
- the dire situation of the threatened indicator salmonid species
- the large, complex ecological changes, and effects of conversions, of which habitat fragmentation is just the most obvious
- the effects of commercial reservoirs and wells on local streams, aquifers, and downslope water availability and quality
- the need to study the effects of pesticides and herbicides, commonly used for vineyard conversions, on local and downslope water quality
- air quality in the immediate area of the conversions and downwind across Sonoma County.

Sincerely,

**James A. Jordan, Jr.**

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Secretary

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