

10/31/06

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California Department of Forestry
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RE: Scoping comments for the Proposed Roessler/Martin TCP joint Environmental Impact Report

October 31, 2006
To the Department of Forestry:

Please add these comments to oral comments expressed at the Annapolis-Sea Ranch community scoping meeting of October 19, 2006 at Horicon School.

These comments are 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).

Scoping should include information on all THPs, timber harvest exemptions, three acre exemptions, etc. that have occurred on the Roessler property, including previous ownerships. Included should be a list of past mitigations that were required for the harvests on this property including planting of trees and culvert replacement on Flornoy Rd. Scoping should include a record of which mitigations were actually performed and which ones were not performed, including tree planting and culvert replacement on Flornoy Rd. Were any trees planted as THP restocking mitigation later removed for the three acre conversion harvest or this current conversion? The piecemeal approach to developing this vineyard/conversion should be addressed.

Scoping should include any deed restrictions/CC&Rs and conservation easements that prohibit commercial enterprises on either THP/TCP applicant properties.

Flornoy Rd switches back and forth below the Roessler conversion as it winds down the steep canyon to Little Creek. Erosion patterns on the banks along the road below the existing three acre conversion and proposed expansion vineyard should be included, paying special attention to the erosion on the switchback banks as runoff from the Roessler vineyard eats into these banks and runs down the canyon to Little Creek. Increases in storm run-off from tree removal, removal of forest litter, and soil compaction and how these impacts relate to the erosion on the Flornoy Rd switchbacks need to be addressed. Emphasis should be focused on sediment impacts related to the first flush that

occurs with the first heavy rains of the season and with sediment impacts that occur after ground saturation and unstable steep-sloped bank saturation.

Impacts from the increase of commercial vineyard traffic on the conditions of these steep Flornoy Rd. switchbacks should be addressed for both in summer conditions and winter conditions.

Scoping should include the impacts of increased peaks flows due to tree removal, removal of forest litter, and soil compaction to the mass wasting and collapse of the abandoned road that runs next to Little Creek below the Roessler conversion area.

CO₂ release data resulting from these harvest/conversions and soil disturbances needs to be included with an additional focus on release of stored soil carbon and destruction of arbuscular mycorrhizal soil fungi that exist in a symbiotic relationship with the trees and vegetation being removed. Comparison of carbon sequestration potential of the proposed vineyard and the sequestration potential of the existing forest and existing mycorrhizal soil fungi should be included.

The impact of these timberland conversions to the Sonoma County Climate Protection Campaign should be included. Sonoma County adopted a goal of reducing its greenhouse gas emissions by 20 percent from the year 2000 to 2010.

Well yield data needs to be updated with 72-hour dry season well tests. Water usage and irrigation impact on summer low flows in Little Creek, Grasshopper Creek and Buckeye Creek needs to be included. Water withdrawal impact on neighboring wells and cumulative impacts of water withdrawals from all other vineyards on Brushy Ridge should be included.

Without California State Organic certification, projected pesticide and herbicide usage should be based on typical non-organic farming methods for these vineyards. Cumulative effects from pesticides, herbicides, fertilizers, organic nutrients, and typical agricultural chemicals used by all existing and proposed vineyards that drain into the Gualala River system should be included. Potential impact on salmon and steelhead from these agricultural chemicals should be included. Potential impacts of concentration of these agricultural chemicals in the Gualala River estuary should be included. Existing herbicide use by the timber industry in the Gualala River watershed should be included in cumulative impacts. Special emphasis should be placed on Roundup, which is widely used on vineyards that drain into Little Creek, Grasshopper Creek and Buckeye Creek.

Microclimate changes from deforestation/conversion and stresses on the surrounding forest should be addressed, with one focus on the impacts from the individual projects and another focus on the cumulative impacts of microclimate changes from all existing and proposed vineyards in the Gualala River watershed. Also included should be impacts to the existing water sequestration potential from fog drip.

The Dept of Fish and Game and NCWQCB identified concerns about the Little Creek Road system in the PHI comments to the Hansen/Whistler conversion project. These same concerns apply to the Roessler conversion, which uses the same Little Creek road system and should be addressed. The relationship of unpaved road density to sediment production and salmon health in Little Creek watershed and Buckeye Creek watershed should be included.

The impact of summer dust prevention chemicals on winter road conditions for Flornoy Rd. and winter runoff into Little Creek should be included.

Claims of dry farming should be investigated fully. Data showing water holding capacity potential of Annapolis area soils in general and site specific data should be provided along with analysis of soil type requirements essential for successful dry farming.

Respectfully submitted,

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