

California Department of Forestry  
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**RE: Scoping comments for the Proposed “Annapolis Area Timberland Conversions Project” (Roessler/Martin TCP joint Environmental Impact Report)**

October 27, 2006

To the Department of Forestry:

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

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).

1. Project Scope. If the project is call the “Annapolis Area Conversion Project”, why is the Artesa conversion project that has had a scoping session (now out of date) not included in this EIR preparation? The Martin project is significantly closer to Artesa than Roessler. Cumulative impact analysis done properly would point to including Artesa. A proper programmatic EIR encompassing cumulatively significant projects in the area is called for.
2. Project Definition and description. Two different ownerships make any requirements for mitigations, oversight, monitoring, and enforcement difficult legally and effectively. The many differences in the projects sites: slopes, water supply methods, drainage and road issues, and future management plans call for project specific EIRs. The planned conservation easements for Martin will add to the difficulties above and the inappropriateness of combining the two ownerships into one EIR.
3. The map included in the Martin plan is incomplete. Not all structures and nearby residences and well sites are included. Proper analysis of CEQA checklist items would need this information. A property boundary is missing on southern edge of Probert property.
4. Proper cumulative effects data and analysis must and include granted THPs, NTMPs, conversions and recent similar projects. Examples are the PPV project on Evans Ridge, all conversion applications granted in area (Campbell, Putnam, Jones), new plantings near Putnam/Pankowski, Kendall Jackson, Peay, Lewers, etc. these latter planting will not show up on CDF records and need to be located and research through county records. A complete list of projects and assessment of their cumulative impacts when added to these new projects is needed.

5. Watercourse Data and Analysis. Addressing the potential direct and indirect impacts to the hydrology and biology of the area require that every one of the connected and effected watercourses of these individual projects must be included.
6. Maps of this project should include a version showing these new projects, in the area conversions, vineyard, and other current agricultural plantings. This would undoubtedly include the Artesa project.
7. Contribution to CO2 and global warming from these projects needs to be included and a dedicated analysis of the net carbon contributions of these completed projects projected into the future need to be included. The young conifer forests that will be sacrificed by these and anticipated projects are among the best carbon sequestrators on the planet. Their loss for a net carbon producing commercial enterprise does not follow common sense or the new emphasis of Sacramento leadership to cut CO2 emissions. This is the most destructive type of project to allow in the light of our local priorities and global responsibilities.

A detailed analysis of the before-and-after carbon budget is needed. The analysis should minimally include estimates for petroleum needed for one time project establishment including embedded energy for materials manufacture (fencing for instance). For comparison to forest management yearly cost must be figured for: transportation needs of labor and equipment, equipment use, soil tilling, yearly vineyard maintenance, pesticides and herbicides, irrigation pumping, frost control, lighting, road maintenance, etc. This should be compared to the yearly carbon budget of a functioning existing forest.

8. Aesthetics: the visual impact of miles of fences, gates, driveways, structures, light pollution at night, stored equipment, parked cars, wire trellising, annual burning of trimmings, etc. Visual character of the area affected. Compared to the lost natural forest and woodlands landscape. Direct and indirect cumulative contributions should be addressed.
9. Vineyard workers. Will the project proponents provide for the infrastructure and social needs of the many workers that will be needed to install and maintain into perpetuity these commercial agricultural installations? Housing: will workers be forced to commute long distances from less expensive urban areas to work daily in these fields? Road maintenance, traffic volume, traffic dangers all will increase. Should not the proponents provide verifiable affordable housing on site in each of these projects to prevent long commutes and the taking advantage of low-income labor?
10. Traffic analysis and study of the effects of adding to cumulative potential impacts is needed to assess issues as safety, county costs, noise, and pollution. None of the roads in the area other than Highway 1 meet AASHTO standards. Some are so narrow that a median stripe is not legal. Trip analysis stemming from these commercial activities proposed is needed. The additional affects to present and potential future projects on cumulative impacts needs study and site specific data.
11. Site-specific botanical reports with appropriate seasonally timed searches are needed.
12. Reporting on potentially sensitive vegetation such as wetlands and seeps is called for.

13. Infrastructure. How will the children of these workers be accommodated in the existing schools? Language programs will be needed, increased social needs and costs are associated with the many likely undocumented workers that will be turned to service these vineyards.
14. The highest and best use of these lands is to maintain them in sustainable timber production as required by the Forest Practice Rules. Fragmentation of these timberlands will incrementally impact ability of the resource base to sustain a viable timber industry in the area.
15. Land Use Policy. The Sonoma County General Plan makes the timber production, watershed, fish and habitat, and biotic values the goals of its zoning and stated plans goals. The conflict with county land use planning must be addressed in the Land Use and Policy section. Loss of prime timberland is proposed. Many stumps on the Martin property are 4 feet in diameter pointing to its potential as prime timberland.
16. A net increase of sediment will potentially occur compared to the natural forest biota that presently exists. A sediment budget for projects' sites should be part of the study. No net increase of sediment is required by Basin Plan regulations.
17. Roads (to and from site and on site), cultivated vineyard rows and vines, will all contribute to a net input of sediment over existing conditions without the conversions. Baseline data on sediment needs to be included for proper review and analysis. Wet and dry season data should be included.
18. CCandRs are existent on the Roessler parcel. The legal ramification of CCRs prohibiting commercial activity on the subdivision that Roessler is in need to be identified and addressed.
19. Is terracing still planned for the Roessler project? Will a grading permit be allowed for this activity by the County? What impacts are introduced with establishing and maintaining terracing for the project life?
20. The characterization of the introduction of vineyards into these coastal forestlands as a major land use change is justified. The contribution of these projects to the potential impacts of deforestation and introduction of commercial agriculture on the scale that seems immanent from the proposed and potential projects needs to be fairly evaluated.
21. Geology: Landslide potential into potentially effected creeks. Soils are unstable. What data and base line data will be collected and analyzed? Aquifer drawdown is a potential effect from the commercial wells proposed. Thorough analysis will be needed for the EIR. Well location data is available from adjacent neighbors to the projects' sites.
22. If organic methods are proposed, as mitigation against hazards from chemical pollution, how will the certification of the projects as organic under existing regulation be enforced? What provisions are to be included if a future owner drops organic methods? If they are not going to be organic operations, what data and baseline be included in the EIR that address potential chemical hazards?
23. Water Use. The EIR should include the latest and best available scientific data as to the water needs of vineyard plantings in the area. Water needs data for frost control cannot be omitted, as frost is a present vineyard threat in protected areas in Annapolis. Drought year info should be included in all analysis. Peak flow

- reductions from water collection on vineyard sites must be analyzed for impacts. Depletion of stream flow of the Class I Little Creek is a concern.
24. Fire: How will fire hazards from the proposed operation of commercial agriculture be dealt with? The last large fire requiring aerial tankers stemmed from vineyard worker actions. Contribution needed to the local fire department to mitigate the new responsibilities of providing fire protection to a commercial enterprise in an area that is difficult to fight fires in.
  25. Police protection needs are increased from this development. This along with other potential increased infrastructure needs for the area need to be addressed.
  26. Water availability. In light of the area's water scarce area designation and to demonstrate and assure adequate availability, the EIR should include a full 72-hour well test from a certified and licensed expert be put in the public record for each well to be used for commercial uses on the projects. Analysis of water needs for operation of the project must include data for dry years and frost protection. Adequate verification of proper and environmentally sound water collection to meet the needs of the project must be submitted. Effects of surface water collection on the hydrological regime of the area must be addressed using site specific data collected in dry and wet months of the year.
  27. Wells, surface water collection and reservoir storage plans must include data and analysis of the effect on nearby aquifers, watercourses, municipal systems, and habitat. Water sources are lost for wildlife from spring development and ground water withdrawals. Mitigations need to be proposed. Effects due to loss of summer river flows as now experienced by the Navarro River on watershed recreation and present appropriations need to be included.
  28. Alternatives. Significant effects of the project (why an EIR is being required) would be avoided and /or significantly lessened by changing the location of the project. It could achieve most of its basic objectives at an alternate site that would not require destruction of forest and commercial timberland. The project alternatives to the project considering the availability of other more appropriate sites should include a No Project Alternative. Significantly lessening the size of the projects should be considered an alternative. If the basic purpose is economic, off site alternatives that offer a comparable, reasonable return on investment should be determined. Acquisition for a conservation purpose should be included as an alternative if such a reasonable return is possible.
  29. Increased cumulative development pressure from these projects. The subsequent uses of the converted lands should be addressed. The usual land use succession after conversion from a natural landscape is common knowledge. The pressures resulting from this initial conversion in an area that has yet to experience any such potential large land use change require proposals for mitigation for growth inducing impacts.
  30. Vineyard Economics. A continued recognized glut in grapes and increasing foreign competition point to the need for a defense of the economic feasibility of these new deforestation/vineyard projects.
  31. Introduction of nitrogen fertilizers and its effect on watercourses.
  32. Light Pollution. Effects of night lighting on wildlife foraging and use. Effects on neighbors.

33. Loss of large woody debris and the habitat it represents from the loss and clearing of the forest in these projects must be analyzed and included in the study.
34. Tasting rooms not far behind? We have one now. Wine factories? What are the prospects that these projects will make these enterprises more likely? What will mitigate all of their environmental effects?
35. Evidence needed to establish the feasibility of dry farming. No real data and analysis submitted so far in any previous plan. Evidence from local growers is that dry farming is not feasible. Data is needed to prove its possible use.
36. Noise pollution in a relatively remote and very quiet natural setting. Spraying, commuting workers, on site noise from operations, trucking of equipment, grapes, etc. Baseline data needed. Mitigation proposals needed.
37. Habitat Fragmentation. Wildlife corridors, mitigations for loss of shelter, feeding, migration/movement, take, effects of fencing and trellising all need addressing.
38. Conservation easement setting aside lands not similar to those converted is not a proper mitigation. Set aside lands should be “like kind” to qualify as a true mitigation.
39. Air pollution due to fuel use and burning.
40. Resource destruction from these plans worse than the effects of past Resource Extraction. The latter can be recovered from with time, the former is permanent. All effects on biotic resources from deforestation should be addressed.
41. The draft EIR should be made electronically available due to our remote area and the difficulty in visiting Santa Rosa. The trip takes 2 hours one way.
42. The complete administrative files of the THP/TCP for Martin, Roessler, and Whistler/Hansen should be included in the EIR administrative file. Pertinent documents pertaining to all three projects are included in the Whistler/ Hansen file.

Respectfully submitted,

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