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**Redwood Chapter**

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Attention: Allen Robertson

October 31, 2006

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

Dear Mr. Robertson,

Please consider the following comments, which are submitted in response to the Notice of Preparation (NOP) for the Draft Environmental Impact Report (DEIR) which is 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).

Segments of the wine industry have increasingly been targeting forestland in Western Sonoma County to convert the land to wine production for such projects as these. The popularity and prestige of Pinot Noir and other high-end wines to be grown on forested ridge tops, is causing unprecedented and rapid change in land use in Sonoma (and Mendocino) Counties. This growing threat has been exacerbated by high wine prices, and the fact that some grape varieties are preferentially cultivated on steep slopes with poor or rocky soils, (i.e. areas that had not been previously cultivated for other crops). In the last year more timber conversion applications were filed with the California Department of Forestry than in the past 10 years altogether.

Entrepreneurs and speculators are now buying depleted forestlands rather than waiting until natural forest regrowth occurs – they wish to convert over-logged lands to what they hope will be more profitable use. But it is not as though Sonoma County doesn't already have a goodly number of vineyards, and plenty of other suitable, non-forested agricultural land available on which to develop more.

Conversion of forests, woodlands and other natural wildlife communities to vineyards poses a serious ecological threat within the Sierra Club Redwood Chapter geographical area. Avian, terrestrial and aquatic wildlife habitat is at risk through conversion of timberland and other natural communities to vineyards and other agricultural uses. The environmental harms include many of the factors identified by the Forest Protection from Conversion Committee of the Redwood Chapter.

Ecological impacts of vineyard conversion include habitat fragmentation, fresh water depletion, pollution from toxic substances used for farming, soil erosion, and down stream flooding, loss of biodiversity, and increase of edge effects, disruption of wildlife corridors, ground water depletion,

impoundments of water and water diversions from streams, increased rate of flows causing bank flooding, bank failures, mass wasting and other river dis-equilibria, sub-surface hydrologic flow changes, pollution to fresh water sources caused by pesticides and herbicides, sediment inputs and mobilization of mercury, asbestos and other geologic particulates, re-contouring, deep soil disruption, micro-climate changes, invasion of exotic species, endangered species "takes", aesthetic impacts, and economic impacts to the County's infrastructure.

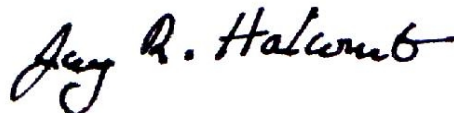
The Sierra Club supports preservation of natural ecosystems. These natural vegetation types include commercial timberlands, oak woodland, grasslands, savanna, mixed oak conifer forests, and chaparral. All of these habitat types provide enormous value to a wide range of species, some of which have been identified as threatened or endangered.

We support the conservation of existing low-intensity-use agricultural lands - such as rangelands - as these are more compatible with wildlife, and soil and water conservation values, than high intensity vineyard use. If converted, the net loss of low-intensity-use agricultural lands should be minimal and should not result in fragmentation. Further, any vineyards replacing low intensity uses should conform to best management practices, giving consideration to slopes, existing natural vegetation, erodibility of soils, streams, wetlands and seeps, listed plant and animal species, slides and archaeological sites. Conservation measures should be employed that include stream setbacks, retention of native vegetation, wildlife corridors, limited fencing, no pesticide use, limited water use, conservation easements and other mitigations that are designed to reduce ecological and aesthetic impacts.

The Sierra Club opposes water diversion and impoundments associated with vineyard conversions. Because many North Coast rivers and streams are on the EPA's 303(d) list of impaired water bodies, appropriate flows must be allowed to sustain viable and healthy fish habitats. The Sierra Club also opposes damming of canyons and drainages in forest areas so as to create reservoirs for storage of agricultural irrigation water. Such reservoirs destroy the natural forest vegetation and wildlife habitat, and in addition, destroy water courses with fishery and potential spawning habitat. Possible release of the wastewater in storm situations can result in contamination of associated creeks and rivers. Installation and maintenance of pipelines and service facilities will impact additional natural areas outside the reservoir.

Because all vineyard development needs to be evaluated for its potential to cause significant, adverse environmental impacts, the major focus of all agency and public review for this EIR should be the cumulative impacts of proposed projects, including all foreseeable projects within the watershed. These would include the much discussed "Preservation Ranch" vineyard and residential project. The alternatives analysis should include study of alternative locations for these vineyards, and discussion of the potential for economic failure of vineyards due to their presently unstable economics.. The growth-inducing impacts of vineyards in the Annapolis area should be included in the discussion.

Sincerely,

A handwritten signature in black ink that reads "Jay R. Halcomb". The signature is written in a cursive, flowing style.

Jay Halcomb, Chair  
Forest Protection from Conversion Committee  
Redwood Chapter, Sierra Club.