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Planning Commission
Sonoma County
2550 Ventura Ave.
Santa Rosa, CA 95403
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Dear Commissioners,

There are grave difficulties in the Timberland Ordinance you are considering (Option 5). What are the benefits which are being sought in this Ordinance, and can the County adequately provide them?

Is the goal to maximize sustained yield, for instance? One difficulty: some conservation easements -- which might be held in perpetuity -- still allow for further logging. If this is to be so, when and how, and how will it be determined how much? **How will the County monitor this, and what will be the expense?**

Or is the perceived benefit ecological restoration? Biodiversity improvement? Again, **how will the County monitor this, and what will be the expense?**

Clause 3 of the proposed Ordinance (Option 5) speaks of the 'rehabilitation' of understocked lands, but this notion is undefined in the Ordinance. Some points should be made about the attempted rehabilitation of forests, and about the County Ordinance language, **What is the goal here, specifically?** Is it forest restoration, rehabilitation, or reclamation (see below)? Is it reforestation (restoring degraded forest) or afforestation (growing forest on land which has not been forest, at least for some long period)? Each of these concepts may differ significantly in ways which are **entirely unaddressed** by the present ordinance proposal. When the ordinance speaks of 'rehabilitation', then, in which of these senses is it meant: 'restoration', 'rehabilitation', or 'reclamation'? (Please see definitions in the attachment, **David Lamb, "From local changes to landscape changes: how to restore degraded landscapes as well as degraded lands?"**, http://www.rrraul.org/flr_lamb_ext.pdf; see also a **Primer on Forestry Rehabilitation**, <http://www.rrraul.org/PrimerForestryRehabilitation.pdf>.)

With respect to the Ordinance language, it is not clear what the goal of Clause 3 is. The Clause speaks of rehabilitation, but does not adequately define what rehabilitation is, nor define upon what lands it is to be practiced, nor adequately define how or when success or failure of rehabilitation is to be determined. How is the County going to determine these matters when administering the Ordinance?

Another difficulty with respect to rehabilitation is that the definition of 'unstocked land' (which is the definition which determines what land is a candidate for 'rehabilitation') is

an entirely negative one: land is unstocked when it is not stocked according to the State FPRs . Land is unstocked in the FPRs when it fails to have a minimal point count/basal area of either commercial trees of Group A or Group B (Group A only, in the Ordinance). So the question arises: what land is to be considered a suitable candidate for restocking?

Let us consider some scenarios. In the **first scenario**, two acres of land are only very slightly understocked (say in point count or basal area), and in a short time they will again be restocked by natural growth (or just by the addition of some seedlings). It would seem under the present Clause 3, these acres would technically satisfy Clause 3, and could be put under an easement in exchange for cutting down another acre of forest. **How is this not a net loss of forest** -- of slightly understocked forest, but still a loss of forest?

Consider a **second scenario**, involving two acres of rangeland or other largely non-forested land, but acreage which is Site I, II, or III (perhaps it was forest at some previous time). The proposed Ordinance depends upon the Forest Practice Rules definition of 1) timberland, and 2) of stocked timberland. The FPR definition of timberland is, essentially, "land which is available for and capable of growing commercial timber" The land in this example is certainly understocked at present, and is land capable of growing timber. Is it a candidate, though, for 'rehabilitation', say by planting seedlings? How is it determined if this land is available for growing timber?

A question also arises about the contiguity of the acres to which the ordinance is to be applied. Are all the acres to be contiguous? Only some? Any at all? The ordinance also speaks of replacement 'within the local area'. What is meant by that? What issues of habitat fragmentation may arise under application of Option 5? How will the County manage this aspect of rehabilitation? If the question of habitat fragmentation cannot be addressed by the County, is advisable to consider an Ordinance which will introduce it?

A final difficulty: why is the Ordinance only requiring CDF's minimum stocking standards in the first place, and why are no restrictions placed on the acreage which can be converted (permanently cut down)? Why not require higher stocking standards (or some more ecological measure of forest health) on the acreage which is to be maintained? Additionally, there is no restriction in the Ordinance on what standards (other than comparable Site Class) should apply to the forest which may be allowed to be cut down in exchange for two acres of minimally stocked forest. Here is a **third scenario** which the Ordinance permits: the cutting down of an acre of old-growth redwood forest, in exchange for two minimally stocked acres of Site I class, which might be exclusively pine or any other Group A species.

Each one of the questions we've asked above (and many similar) must be addressed before the County gets into the business of administering any forest 'rehabilitation' scheme. These questions *will* be answered in practice, one way or another, if this ordinance is adopted. How well can they be answered? How is the County going to administer any such scheme?

In summary: we are addressing the Sonoma County *Planning* Commission, so we must ask, what is its *Plan* for permitting beneficial timberland conversions? The present proposal is fatally flawed. The County does not have the expertise or resources to properly administer 'rehabilitation' (or is it 'restoration', or is it 'reclamation'?) -- nor does this Ordinance require anything like proper administration. We strongly urge you to reject Option 5 in favor of Option 3, which

simply prohibits such conversions in the first place. **Please retain Sonoma County's forests!**

Please also see the excerpted editorial "*Perils of Pollyannas*", <http://www.rrraul.org/PerilsOfPollyannas.pdf>, by Reed Noss, conservation biologist, and "**Retail restoration and mitigation: forest conservation during the Grape Rush**". http://www.rrraul.org/FoGR-ICOoped_Retail_Mitigation.pdf. by Peter Baye, plant ecologist.

Sincerely,

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The Gualala River, north to south, showing previous clearcutting in the watershed. See also: <http://maps.google.com/maps?ll=38.738308,-123.410110&spn=0.131836,0.230026&t=k&hl=en>