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Sonoma County Planning Commission  
Sonoma County  
2550 Ventura Avenue  
Santa Rosa, California 95403

July 18, 2006

Dear Commissioners:

Thank you for the opportunity to comment upon forestry issues in the Draft General Plan Update. First, we make a general comment.

This new ruling by the California Supreme Court has clarified the situation with respect to the various counties' authority over where timber harvesting and conversion can occur. (*Big Creek Lumber Co. vs. County of Santa Cruz*, <http://www.courtinfo.ca.gov/opinions/documents/S123659.PDF>). Since the ruling has validated the County's authority about land-use decisions with respect to forested lands, it is more than ever **critically important** that Sonoma County exercise particular environmental sensitivity in administering forest land uses.

To quote from the General Plan update:

"There are approximately **232,000** acres of timberland in the County. Sonoma County is unique among many counties in California because 94 percent of the timberlands are privately owned. In order to assure that timber resource lands are available in the future, the California Timberland Productivity Act requires the County to designate timberlands in the General Plan and to establish "Timber Production" zones where uses are limited to timber production and compatible uses. The County currently has **69,000** acres of its commercial timberland in "Timber Production" zones. Pressures on timberland include rural development, agricultural conversions, and increased public scrutiny regarding the potential impacts associated with logging operations, particularly near streams. These issues can affect both the economic feasibility of the timber industry and/or the long term availability of timber resources. However, since State law gives primary regulatory responsibility for timber operations to the California Department of Forestry and Fire Protection, the County's land use authority is limited. Instead, the County has focused its policy directives on the maintenance of a sustainable supply of timber resources in the future by **reducing the potential for conversion of timberland to incompatible uses.**" [Emph. added.]

Doing the math, this passage implies that about **70 %** of Sonoma County's timberland is NOT zoned TPZ. Furthermore, TPZ lands can be **rezoned** out of TPZ. The **new situation** arising out of these facts and the Supreme Court decision have the effect of **greatly increasing the County's responsibility** to protect our forests, which are under increasing pressure from the risks of development and other forms of agriculture, principally vineyards.

For more discussion, <http://redwood.sierraclub.org/sonoma/ForestProtection/index.html>.

We also want to note that the Mendocino County Board of Supervisors has recently adopted as environmental policy the well known 'Precautionary Principle' (<http://mendoprecaution.org>). The Precautionary Principle says in essence that "**An ounce of prevention is worth a pound of cure.**". If a practice poses a threat to human health or will cause serious environmental damage, the Precautionary Principle commands us to use the best available science to identify those measures that would prevent harm. **We have a positive duty to take anticipatory action.** We urge our Supervisors, the Planning Commission, and PRMD to adopt a similar attitude and measure – and then to **implement it effectively.**

The recent Sonoma County Timberland Ordinance and Resolution have been moving in the right direction, but they **have not ensured** adequate protections. **What is wrong with the County's solution?** The most glaring fault of the present ordinance language is that it credits landowners for doing what they cannot help but do anyway. This refers to the 2 for 1 mitigation aspect of the ordinance – also erroneously known as 'no-net-loss' – the part which requires preservation of 2 acres of timberland for every acre converted. But much of our forestland is not convertible in the first place (slopes too steep, it is in riparian zones, etc.) However under the present ordinance language a landowner who owns twice as much non-convertible land as potentially convertible land, could still be allowed to convert all of the convertible land which he owns. How is this a protection of forest? The idea of 'preserving' timberland which is not in any danger of conversion is bogus. The County should instead be protecting forest which is actually in danger of conversion. Credit for the protection of timberland should be given only for protecting land which can actually be converted. Credit should not be given for 'preserving' land which can be legally and practically be put to no other use. **We strongly urge the Supervisors to close this gaping loophole with an appropriate 'like-kinds' Amendment to the Ordinance. We have earlier suggested language to County staff.**

We want also to reiterate that the important issue of habitat fragmentation was stressed in the recommendations of the CAC. ("**Further, timberland conversions are not allowed if they result in habitat fragmentation**", <http://www.sonoma-county.org/prmd/gp2020/pdf/082103tc.pdf>. This habitat fragmentation language should be repeated in other appropriate sections of the draft update. It now appears in

**"Policy OSRC-12e:** Revise the zoning districts which implement the Resources and Rural Development land use category to prohibit agricultural production and other uses which would result in the conversion of timberlands unless the uses qualify for a timber conversion exemption pursuant to the Forest Practice Rules, they provide an overriding benefit, or they result in no net loss of timberland. **The districts shall also provide that these exceptions are not allowed if they result in habitat fragmentation.**" [Emph. added.; **note also that the 'or' in the last phrase should be changed to an 'and', in order to comport with the County's recently passed ordinance, which has an 'and'.**]

One of the largest impacts of conversions in areas of forestlands in the West County is habitat fragmentation.

"Biodiversity is reduced when natural habitats are converted into urban, suburban and agricultural land. This problem is compounded by the fragmentation of contiguous natural areas into an increasing number of smaller fragments, each of which may not be large enough to support viable populations of all the original inhabitants. Fragmentation has been linked to a number of environmental consequences in Sonoma County and elsewhere. These include physical effects due to increased amounts of forest edge that cause changes in microclimate and can result in tree mortality. The biological effects of fragmentation include a decline in species requiring large amounts of connected habitat

and increased predation of native fauna." (Heaton E and Merenlender A. "Modeling vineyard expansion potential habitat fragmentation", California Agriculture, vol. 54 no. 3, Page 16)

"With a population increase of 282% from 1960 to 1995, Sonoma County is one of the fastest growing counties in California. The pressures to convert forestlands are strong. With a size of around 1 million acres, it contains a substantial amount of hardwood rangeland (135,599 acres) and forest (561,468 acres) (ABAG 1996). Over 90% of the land is in private ownership. Using a GIS mapping system researchers have recently revealed that 11,663 acres of new vineyards were planted from June 1990 through June 1997, bringing the acreage of grapes to at least 48,000 acres in 1997. This was 20% higher than the Sonoma County Agricultural Commissioner's estimate at the time." (Merenlender A. 2000 Mapping vineyard expansion provides information on agriculture and the environment, California Agriculture vol. 54 no. 3)

Other quotes from the above article are:

"Conversion of undeveloped land to vineyards involves the clearing of native upland and riparian vegetation, this type of conversion has the potential to affect natural resources-increasing hillside erosion, impacting endangered species or impeding wildlife migration. In addition, increased vineyard development may lead to overproduction of wine grapes, loss of local agricultural diversity and changing scenery." (Ibid, Page 8).

"In addition, the loss of diversity in agricultural systems can have consequences for California Agriculture. Moving toward a single agricultural crop across the North Coast is at odds with the principles of sustainable agriculture, and could lead to over-reliance on a single industry." (Ibid, Page 10.)

"Ecologically, oak woodlands are the most diverse ecosystems in California, providing critical habitat for approximately 2,000 plants, more than 100 birds, 60 mammals, 80 amphibians and reptiles, and 5000 insect species." (Ibid, Page 10).

"The CDFG lists increased sedimentation, introduction of nonnative fish species as a result of increasing the number of reservoirs, and loss of wetland habitat as issues of concern for watersheds with vineyard development." (Ibid, Page 11).

"Although our research focus has been on oak woodlands, some North Coast vineyards have replaced conifer-dominated forests that include redwood, Douglas Fir and tan oak trees. However, very little data on this trend exists for Sonoma County because it has occurred so recently and is not reflected in the available maps and statistics on vineyard acreage." (Ibid, Page 11).

In general, the Sonoma Group supports many of the policies, goals, and objectives of the Draft Update. In particular, we want to emphasize the importance of this policy:

**Policy OSRC-12b:** Review all timber harvest plans for compatibility with General Plan policies Sonoma County General Plan 2020 Public Hearing Draft and economic viability of the industry.

We inquire, though: **what mechanism is the County going to institute for doing this critical review, who will do it, and how is it to be paid for?** Without scrupulous review, the other policies and goals of the County respecting timberlands will avail very little in the way of actual forest protection. Additionally, if the County is going to review THPs, it will need to consult with other appropriate agencies;. Specifically, the County will need to consult with the Calif. Dept. of Fish and

Game and with North Coast Regional Water Quality. There is language in the update towards this effect: it must be implemented.

The following policy seems confused and needs clarification to comport with State regulation. As it stands, this phrasing is weaker than State regulation. CDF already prohibits, and prohibits more stringently than the item below, clear-cutting within Watercourse and Lake Protection Zones. CDF requires 85% overstory retention for selective logging around Class I streams, e. g., and 70% retention around Class IIs. Also, this rule would only seem to have practical effect where no commercial use of the trees was intended (and hence no CDF permit was applicable). Is that the intent?

**Policy OSRC-12d:** Review timber harvest plans adjacent to designated riparian corridors and request that clear cutting not occur within streamside conservation areas. Where clear cutting is approved by the applicable state or federal agency along designated riparian corridors, ensure that at least 50 percent of the overstory canopy and at least 50 percent of the understory vegetation be retained.

The Sonoma Group opposes clear-cutting in most circumstances, particularly for commercial harvesting, and especially in riparian zones.

In summation, where the General Plan Update considers issues affecting forest management in five broad areas (timberland conversions and harvest, water and riparian issues, biotic resources, timberland soils, and timberland resources), we support the Planning goals. For re-emphasis we want to mention in particular, the following goals and their respective fleshings-out in the update documents:

**GOAL OSRC-7: Protect and enhance the County's natural habitats and diverse plant and animal communities.**

**GOAL OSRC-8: Protect and enhance riparian corridors and functions along selected streams, balancing the need for agricultural production, urban development, timber and mining operations, flood control and other land uses with the preservation of riparian vegetation, water resources and habitat functions and values.**

**GOAL OSRC-10: Encourage the conservation of soil resources to protect their long term productivity and economic value.**

**GOAL OSRC-12 Preserve, sustain and restore forestry resources for their economic, conservation, recreation, and open space values.**

As we've said, with those reservations noted above, the Sonoma Group supports the general tendency of these policies and goals. However, the conversion of forests, woodlands and other natural wildlife communities to development and intensive agriculture still poses a serious ecological threat within the Sonoma County and, indeed, within the Sierra Club Redwood Chapter geographical area. The Sierra Club supports the preservation of natural ecosystems and supports the conservation of existing low-intensity-use agricultural lands, such as rangelands, as those uses are more compatible with wildlife and soil and water conservation values than are high intensity uses.

The **Sierra Club** supports the adoption of local ordinances and General Plan amendments and zoning that protect natural vegetation from conversion to agriculture and that protect beneficial uses of water. But segments of the wine industry have increasingly been targeting forestland in Western Sonoma County to convert the land to wine production. Last year more timber conversion applications were filed with the California Department of Forestry than in the past 10 years altogether. Speculators are currently buying depleted forestlands with the intent of converting them to more profitable use, rather

than waiting for natural forest regrowth to occur. One proposal already on the books calls for permanent loss of trees on up to 1,900 acres for conversion to vineyards. It is not as though Sonoma County does not already have a goodly number of vineyards and plenty of other suitable, non-forested agricultural land available on which to develop more.

Once the forests are removed they will be lost forever. The negative economic, biological, and environmental effects will be extensive. Our children and future generations will be the real victims of short-sighted deforestation. .

Sincerely,

Margaret Pennington  
Chair, Redwood Chapter, Sierra Club

Jay Halcomb, Chair  
Forest Protection and Vineyard Committee  
Redwood Chapter, Sierra Club

Anne Hudgins, Chair  
Sonoma Group Ex. Comm.

Cc: Sonoma County Board of Supervisors  
Permit and Resource Management Department  
California Department of Forestry and Fire Protection