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Sonoma County Conservation Action

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Board of Supervisors
575 Administration Drive, Room 100A
Santa Rosa, CA 95403-2887
October 4, 2005

Re: Timberland Conversion Ordinance

Dear Supervisors,

Protecting forests from conversions has received more public comment than any other issue before the Board. Throughout the General Plan update process, citizens of Sonoma County have consistently and overwhelmingly demonstrated their desire to protect coastal forests from permanent destruction through conversion to other uses.

The hearing room at your last meeting on the timberland ordinance was packed with supporters calling for a prohibition on forest conversions. There was a standing room only crowd, overflowing into the corridors, and 90% or more were wearing green ribbons showing their support for keeping our remaining forests as forests. 90% or more of the public comments that night were in support of our forests. Additionally, the Sierra Club delivered 1,000 postcards to the Board urging the County to adopt strong forest protection. Public comment on this issue, in general, has been nearly unanimous, Dissenting opinions in the matter have been few, and most of those come from employed advocates of one specific timber conversion project.

The Board at that meeting, however, rejected an outright prohibition on conversions, and instead directed County Staff to prepare alternative measures for your further consideration. We wish, therefore, to present to you our own proposals for performance standards for an ordinance regulating forest conversion.

We want first, though, to remark upon the basis for our concerns. Many of Sonoma County's forests have been battered by years of abusive and non-

sustainable logging practices. Now the forested watersheds of the Gualala, which are already listed for both temperature and sediment impairments, face an even greater threat: permanent destruction through conversion to vineyards.

The urgency for strengthening forest protections comes from the number of recent applications to replace coastal forest with vineyards in the West County. The largest ever such project in northern California is now being designed on a 19,000 acre parcel in the Gualala River watershed. It aims to convert 1,900 acres to vineyards. Forested acres on steep ridgetops are in peril of permanent conversion to intensive agriculture and 'starter castle' residential development. Other conversions are in the pipeline, and PRMD this year has received applications for the conversion of more acreage than in the previous decade.

We strongly urge you, therefore, if you will not consider an outright prohibition upon forest conversion, to consider slowing down the ordinance process and seeking a comprehensive and rigorous permit review system with independent scientific peer review and multi-agency coordination. This can be implemented through a Memorandum of Understanding among county, state and federal resource agencies.

In recognition, however, that the resources and authority of the county are limited in this regard, we offer you the following suggestions for an ordinance governing timberland conversions which will provide an adequate measure of forest protection:

- I. Require that a finding of a public benefit must be made in any proposed conversion.
- II. Require that no conversions be permitted which are:
 - A. on slopes steeper than 15 percent (to prevent erosion), or
 - B. within 600 feet of a riparian zone (for riparian protection), or
 - C. above an altitude of 500 feet (to protect the ridge-tops of higher and steeper elevations, which are particularly subject to erosion).
- III. Require that no conversions be permitted on Site Classes I, II, or upon Site Class III lands which will be at least minimally stocked (according to the California Forest Practice Rules) within 10 years of the application – this determination to be certified by a Registered Professional Forester. Most of our Sonoma County timberland is Site III, and this will permit conversions to be done only of the poorest timberland, thus retaining most of our forest for the beneficial purposes of sustainable forestry. Much of the land we are discussing has already been heavily logged, and over-logged. This land badly needs to be given time to recover, and no forest should be sacrificed to conversion which evidences a reasonable ability to recover as functioning forest; the fostering of sustainable forestry on Sonoma County timberland is a primary goal of the County General Plan.
- IV. Require that all conversion applications be certified by inspection and accompanied with a report of their accuracy, made by an independent Registered Professional Forester hired by the County. This to be paid for by an appropriate fee collected by the County for the administration of the

permit.

- V. Require that for each acre proposed for conversion, 4 acres of at least minimally stocked Site III (or better) timberland be permanently retained under a conservation easement attached to the ownership of the property (one which may, however, permit sustainable forestry under the FPRs).

Why do we especially need to preserve Site Class III, as we've indicated above? There is almost no Class I or II in private TPZ, for instance, the bulk of it is III. The percentages of Site Classes are probably similar in RRD – although there seems to be no information available at either CDF or the County about this; this is just one more reason why we would very prefer to see more science involved in the ordinance formulation process.

Table 7. Timberland Production Zone (TPZ) acreage by Site Class in California as of 2000-2001

County	Total Acreage	Site Class				
Sonoma	82,819	I	II	III	IV	V
		-	3,551	51,664	21,712	5,892

Source: [Timberland Site Class on Private Lands Zoned for Timber Production](http://frap.cdf.ca.gov/publications/Timberland_Site_Class_on_Private_Lands_Zoned_for_Timber_Production.pdf), Forest Resource Assessment Project – CDF, http://frap.cdf.ca.gov/publications/Timberland_Site_Class_on_Private_Lands_Zoned_for_Timber_Production.pdf

The tragedies of the Katrina and Rita hurricanes have reminded us of the disasters which a failure of foresight can bring, while deforestation worldwide is the second leading contributor to the threat of human-induced global warming. Please bear these important lessons in mind as you contemplate action on a timberland ordinance, and in particular, by protecting Site Class III lands, thus align your timberland ordinance with actions which you have recently taken (on Sept. 22, regarding setting Greenhouse Gas Emissions Targets).

Thank you for considering another difficult and contentious issue.

Sincerely,

Margaret Pennington, Chair
Redwood Chapter, Sierra Club

Craig Litwin, Co-Director
Sonoma County Conservation Action

Anne Hudgins, Chair
Sonoma Group, Sierra Club

Jay Halcomb, Chair
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