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Planning Commission
Sonoma County
2550 Ventura Ave.
Santa Rosa, CA 95403
April 19, 2005

Dear Commissioners,

RRRAUL urges the Commissioners to adopt Option 3 of the County's staff report, and to reject Option 5.

There is ever increasing pressure to put more and more vineyards in the western part of Sonoma County, and on steeper and steeper slopes. For example, "Berkeley conservation biologist Adina Merenlender shows that in Sonoma County alone, a quarter of the vineyards developed since 1990 were put on slopes steeper than ten degrees, and about 40 percent were put in above 100 meters in elevation. This is a steep increase from the previous decade, when less than six percent of the vineyards established were on such hilly ground, and only about 18 percent were above 100 meters." [Source: <http://www.calacademy.org/calwild/2005spring/stories/habitats.html>, Gordy Slack, California Wild, The Magazine of the California Academy of Sciences. Spring 2005]

The lands we are now discussing have already been heavily overlogged. As a result the Gualala watershed is 303d listed for both sediment and temperature impairments. [North Coast Regional Water Quality Control Board].

There are potential damages to the environment from every forest conversion. Conversion of forests to intensive agriculture causes fundamental changes in ecological and physical processes that maintain the quality of water, land, and air. These include: a) disruption of wildlife corridors and habitat fragmentation b) groundwater depletion c) downstream flooding d) pollution to fresh water sources caused by pesticides/herbicides, fertilizer, and sedimentation e) sub-surface hydrologic flow changes f) water diversions g) re-contouring of slopes h) deep soil disruptions i) increased peak flows in streams, causing stream bank failure and mass wasting of land j) microclimate changes affecting plants and animals k) endangered species are harmed and their habitat depleted l) aesthetic impacts m) increased infrastructure needs and costs n) the contribution of this deforestation to global warming.

"Forests precede civilizations and deserts follow them." -- Chateaubriand

Mitigation banking doesn't work well. Understocked forest is already forest, which should be allowed to grow healthy, rather than be converted. For example, a permit may be granted to clearcut 10 acres of forest under a scheme in which 20 other acres are to be preserved as forestland, or 20 acres 'restored' to forestland, on land which has already been overlogged. It would be claimed that this is a 'no net loss' of forest, but actually it is a net loss of 10 acres (or 1/3 of existing forest). Additionally, there is no guarantee that the 20 acres being preserved or restored would in fact replace in any meaningful way replace or compensate for the ecological values and functions of the forest which is permanently being destroyed. "Due to failures of mitigation requirements, '... the Section 404 permitting process has been fostering an 80 percent net loss of wetlands.' ", R. Turner, A.M. Redmond, and J.B. Zedler, 2001. Count it by Acre or Function: Mitigation Adds up to Net Loss of Wetlands. National Wetlands Newsletter 22:6 [Quoted from http://www.eany.org/issues/topics/Nowhere_Near_No-Net-Loss.pdf, Julie M. Sibbing, Wetlands Policy Specialist, National Wildlife Federation]

Restocking doesn't work well, and CDF doesn't monitor it well, nor can the County do so. Who is to do such monitoring and how? "If tree planting is invoked as the engine of forest restoration used in a compensatory mitigation (no net loss) context, it needs to be shown to be highly reliable and effective. The burden of proof belongs on the proponents of restocking as mitigation, aside from the multi-decade time lag in functional restoration of forest after restocking of severely degraded forest. If forest is severely degraded (soil loss, exposure of subsoil, erosion, dense brush or tanoak) then there is ample reasonable doubt that restockings of conifers seedlings will not be at risk of high mortality, even with herbicide use. " [Peter Baye, Ph. D., plant ecology biologist.]

Keeping forests healthy actually costs less than the large governmental and private expense of trying to mitigate and/or restore damaged lands and waters. RRRRAUL supports the preservation of natural ecosystems. We support the conservation of existing low-intensity-use agricultural lands such as rangelands and sustainable forestlands, as these are more compatible with the sustainability of wildlife, and with sustainably beneficial uses of soil and water, than is high intensity vineyard use. If they are to be converted, the net loss of rangelands or forestlands should be minimal; especially it should not result in habitat fragmentation.

The loss of the earlier habitat fragmentation language recommendation of the Citizen's Advisory Committee, in the present Option 5 proposal, means that the proposed Option 5 won't work to protect the forest ecology. The other options (3, 6, 7) are much more protective of forests (see the PRMD Staff Report). The proposed Option 5 actually expedites the Premier Pacific Vineyard project, for example.

For these reasons RRRRAUL urges the Commisioners to adopt Option 3 of the County's staff report.

Sincerely,

Jay Halcomb
RRRAUL

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