



P.O. Box 2030  
Guerneville, CA  
95446  
(707) 869-3302  
[rrraul@sonic.net](mailto:rrraul@sonic.net)  
<http://www.rrraul.org>

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

August 23, 2005

Re: Timberland Conversion Ordinance

Dear Supervisors,

Many of Sonoma County's forests, particularly around the Gualala, have already been battered by years of abusive and non-sustainable logging practices. Now the forested watersheds in the Gualala, already listed for both temperature and sediment impairments, face an even greater threat: permanent destruction through conversion to vineyards. 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] Also, "The acreage of conversion requests currently pending at CDF in 2005 is greater than all the conversions approved over the last decade." -- PRMD. These pressures are only going to increase in the near future.

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.

Much of the land we are discussing has already been heavily logged, and overlogged – taken down to less than 3,500 board feet of standing merchantable timber per acre. This is almost nothing, since it is generally agreed that debilitated lands stand at about 10,000 boardfeet per acre, productive forests at 20,000 to 40,000 board feet per acre, and historic natural forest in the area at over 100,000 board feet per acre. "No net loss" and guarantees not to log these lands for 20 years by developers are a "no net protection" for these debilitated lands. To allow for proper rehabilitation these lands should instead not be converted or logged for 40 years or more. But conversion of forestlands is permanent and many complex ecological processes are tragically disrupted. Biologists and ecologists agree that conversion of forest to intensive agriculture causes fundamental changes in ecological and physical processes that maintain wildlife and the vital qualities of water, land, and air. Once forestland is converted to agricultural or other uses, the prospect of regenerating it into a healthy forest ecosystem again is lost forever and further development is much more likely.

All of this is much more likely to happen if so-called 'No Net Loss' measures are adopted. The recent Planning Commission hearings wound up recommending to the Board of Supervisors that no change be made in the current situation, but among the alternatives they considered adopting was a proposal which has misleadingly been referred to as the 'No Net Loss Option'. We say misleadingly because that Option (5) actually allows for the loss of 1/3 of our forestland, provided that another 2/3 is 'restored'. However, an acre of forest lost is an acre lost, and the standards of restoration envisioned in Option 5 are themselves vague and inadequate.

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, doing the math, 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. Moreover, no thought at all is given in Option 6 to the issue of habitat fragmentation which would be introduced by such forest conversions - even though the Citizen's Advisory Committee had recommended to the Planning Commission that protection measures be adopted to meet this concern.

The public has overwhelmingly called for strong forest protections through three years of public hearings. Scientific opinion, including that of the Water Quality Control Board and the Department of Fish and Game, has concurred that forest conversions cause serious environmental concern. RRRAUL urges the Board to adopt Option 3: on RRD/RRDWA lands, with a clause allowing exceptions for 'public use or facilities', and simply prohibiting conversion on TP zoned lands. The other alternatives are inadequate, or cloak destruction in the guise of protection. Maintaining healthy and productive forests, on the other hand, has all

the benefits which health offers over disease, including the economic benefits.

Sincerely,

Jay Halcomb

Russian River Residents Against Unsafe Logging (RRRAUL)