



Central Coast Forest Association

Caring for forests, protecting our land

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to: Santa Cruz County Planning Commission
Matt Johnston
C/O SCC Planning Department
4th floor, 701 Ocean St.
Santa Cruz, CA 95060

from: Eric Moore, Member of the Board
Central Coast Forest Association
P. O. Box 1670
Capitola, CA 95010

re: Negative Declaration for changing the minimum acreage of TP Zoning from 5 to 40 acres

Dear Mr. Johnston and Members of the Santa Cruz County Planning Commission,

The Central Coast Forest Association is amazed that the County of Santa Cruz could file a Negative Declaration on the impacts of raising the minimum acreage to TP from 5 to 40 acres. If landowners of zonings other than TP were still permitted to harvest timber, the answer would be different, but with the current situation, there will be significant environmental impacts. Our assessment of the impacts is listed below.

The initial study mentions that over 4,000 acres of land in the County are potentially affected and that "many" of these property owners have applied for TP rezoning, "reducing the number of parcels affected". How many is many? Is it ten percent, twenty-five percent? The percentage of those applying tells us how much land remains affected by the change.

Geology and Soils:

This was declared as not applicable. This is only true if the property owners who do not change their zoning also do not change their land use from forestland. If they do opt to convert their land to another use, like vineyards or housing, there will be a significant change in the land's ability to hold soil as the majority of the vegetation on the land is removed. This will lead to both increased erosion and an increased potential for landslides on these locations and those downhill of them. Cutting new year round roads for access to housing is notorious for causing erosion problems.

Hydrology, Water Supply and Water Quality:

If property owners who can no longer manager their land for timber opt to move to other uses, there can be significant changes to water supply and water quality. When property owners opt to build

houses instead of leaving their land as forest, those houses then need a supply of clean safe water and will start drawing off the aquifers. They will also be adding wastes and chemicals back into the groundwater through the septic systems. Since this will be interspersed across the county, the affects will not be localized. The removal of tree cover for conversion to other uses will also increase the amount of storm runoff from those converted lands, contributing to increased erosion, as will the increased amount of paved area for the roads and driveways supporting new houses.

Biological Resources:

There will be a very significant impact to the native wildlife. For the converted properties, there will be a removal of habitat, including removal of food plants and shelter and the introduction of exotic species. For the unconverted properties, unfortunately, many of the same affects will be seen, though through a different mechanism. Just because a habitat is “undisturbed” it does not mean it is healthy. When landowners can no longer afford to maintain their lands, the exotic invasives move in and push out the native species. We can already see this in action with the vast amount of French broom carpeting the county. Many of our native species cannot live in these overtaken lands. Many other species that are dependent on open spaces in the underbrush cannot cope in overgrown properties and get pushed out. Not all our local species cope well in old growth forests. This project will lead to habitat degradation. There are healthy levels of crown cover and unhealthy levels. When excessive crown cover is reduced, properties often see a large increase in the number and variety of wildflowers, birds and insects. They like the disturbance and the increased amount of sunlight on the forest floor; it energizes the environment.

If one is trying to protect “significant trees”, often the best thing you can do for those trees is to reduce their surrounding competition. When they are no longer pushed in tightly with their neighbors, they no longer have to compete with them for water and minerals, they get more sunlight, they are less susceptible to disease and they are at less risk of a fire jumping into their branches from their neighbors.

Visual Resources and Aesthetics:

There are significant potentials for changing the scenic corridors on the affected lands. Vineyards and houses do not look like forests. Overgrown scrublands covered in French broom are not very scenic. Dead trees felled by Sudden Oak Death littering a forest are not very scenic. There are visual impacts to not permitting people to care for their forests.

Fire Hazard:

There is a very significant impact in the increase in fire hazard caused by this ordinance. The San Lorenzo Valley and North Coast Watersheds Sanitary Survey Final Report, July 10, 1996, by Balance Hydrologics Inc. notes, “First and foremost, the absence of wildfire throughout the last few decades increase the chances of a major event which could seriously alter surface hydrology and sedimentation in any or all subject water supply streams.” Fuel loading in forestland, measured in tons per acre, naturally increases every year unless it is removed. Removal is usually done either manually by various methods including timber harvest, or by fire. There is no mention of how the County is going to support fuel reduction to mitigate their actions after they have removed the landowners’ ability to pay for the work.

Many of these properties are embedded in residential areas. As these properties become overgrown, and as the trees in them die, the amount of fuel in the properties becomes very dangerous. The property owners can no longer afford to do an effective job of reducing the hazard. In the meantime, other properties will be converted to even more housing, putting even more people at risk from these overgrown stands. Clearing 150 feet around a house may provide defensible space, provided the surrounding trees are not 200 feet tall, but on a 39 acre parcel, it will do nothing to prevent landscape altering fires; a 150 foot circle around a house only treats about an acre and a half. It also does not do much to prevent embers from flying up to these houses in the wind. Evacuation is a serious problem and will just get worse. The County's narrow rural roads are not up to handling a full-scale evacuation when the fire does come.

The County is relying on three very brief reports by Montague, Stephens and Omni to formulate their assessment of fire hazard. The County is not taking into account that these reports were done on the opposite, lee, side of the Santa Cruz Mountains. There is also no mention of local fire history, such as the Love Creek fire in 1970 in the Love Creek drainage which became a crown fire on unharvested forestland and was forced back down to the ground when it got to selectively harvested timberland.

These very brief reports also strongly support controlled burning. Controlled burning can be a very useful tool. Big Basin State Park has been doing it for years. They have also accidentally scorched some old growth groves very badly in the process.

If the County is going to rely on the recommendations of these brief reports, they must also address the environmental impact of 4000 acres of controlled burns. I'm sure there will be some very heavy impacts on the residential properties neighboring these parcels.

The Watershed Sanitary Survey for the San Lorenzo Valley and North Coast Watersheds, March, 2007, an Update to The San Lorenzo Valley and Watershed and North Coast Watersheds Sanitary Survey, July 10, 1996 by Balance Hydrologics Inc. notes more recently, "The potential for large scale fire with multi-year consequences for water supply remains." and "Prescribed burns have since been discussed by Santa Cruz Water Department staff, yet the excessive fuel load poses a significant source of concern. As a result, burning has not been used for vegetation management." They also note fire will increase turbidity in the water supply.

Public Services and Utilities:

If a significant number of the property owners opt to use their land for housing instead of forest land, the increased housing will require a commensurate increase in fire protection, police services, schools, roads, power lines, etc. There will be an increased chance of inadequate water supplies due to the increased population. If the parcel is changed to a more intensive form of agriculture, they will have their own burdens and require other forms of public services. There can still be increased traffic due to farm employees and contractors coming to work on the land and increased need for water for crops. For houses, the traffic patterns would change from having a heavy increase in usage for a few months every ten years as the timber is removed to having a heavy increase on a daily basis as the new residents go about their daily business. Farming usages would increase at the planting and harvest times for the crop. I personally have encountered grape trucks the size of log trucks on very narrow

mountain roads in the County.

Potentially Significant Growth Inducing Effect:

There is mention made of the limited number of properties that are available for subdivision, but the comments do not address taking the entire parcel and converting it to a house site. The number of parcels capable of supporting a house, in-law units and accessory structures will change significantly when counted this way. And, there can still be significant development in clear cutting “conversions” for vineyards and row crops. Our membership and other forest landowners have spoken to us about doing this. They are quite serious when they are talking. Owning forest land properties is an expensive investment that requires a cash flow for annual projects including road and watercourse crossing maintenance, invasive species control, fire protection, etc. Without commercial harvesting, landowners shall be forced to seek other sources of income for these costs. Development is the most likely source.

Therefore, we disagree with the mandatory findings that:

** the project does not have the potential to achieve a short term advantage to the disadvantage of long term environmental goals.* The short term advantages of reduced noise and no ground disturbance are more than counteracted by habitat degradation in overgrown stands and increased fire hazards.

** the project has no cumulatively considerable impacts.* Each small conversion will lead to loss of the overall forest base in the County. Each neglected tract of land will lead to increased problems with invasive exotics and fuel loading.

** the project has no environmental effects which will cause direct or indirect substantial adverse effects on human beings.* The increased fire hazard alone will lead to substantial adverse effects. The change in water supply and usage and water contamination patterns can also be seen to cause significant problems for people.

The Central Coast Forest Association believes the County of Santa Cruz is legally required to complete and publish a full Environmental Impact statement and truly study and understand the impacts of this project.

Yours truly,

Eric Moore CCFA Board Member

cc: CCFA Legal Staff
Santa Cruz Sentinel
Register Pajaronian
San Jose Mercury