

September 20, 2007

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

from: Catherine 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 Madam or Sir,

The County raised the limit for TP zoning from 5 acres to 40 acres this year seeking to reduce the amount of controversy engendered when logging occurs intermingled with housing. In doing so, we believe they have failed to consider the long term ramifications of not allowing timbering in these zones that must be addressed in any Environmental Impact study.

Since timber harvests are by zoning no longer allowed on these smaller parcels, these plots of land will now be prohibited from performing significant fuel load reductions. Even if a landowner can get a permit to reduce the fire hazard, he will no longer be able to afford to have the work done.

Unfortunately, the zoning rules may stop the landowner from managing his land, but they do not stop the trees from growing, or dying, on those plots of land. The trees will continue to grow until they are severely overstocked, then they will start dying from the stresses of overpopulation. This will create regions of extremely high fire danger interspersed among the houses that did not want to hear the noise and turmoil of a timber harvest. The people in these houses will now be faced with the much higher risk to their lives and property of a wildfire sweeping through their land.

This scenario has already played out in the Sierras. In a landscape similar to the situation faced in Santa Cruz County where timbered plots of many sizes are intermingled with housing, the Tahoe Regional Planning Agency had a policy of making it difficult for those owning the timbered parcels to adequately reduce their fuel loads. Permits were regularly delayed, restrictions were placed on the operations, the amount of fuel reduction that did get done was ultimately not enough. Then, in late June 2007, the Angora fire ran through the region. When all was said and done, 3100 acres were burned, 254 houses and 75 commercial structures were destroyed, and the people whose lives were so affected are holding the Tahoe Regional Planning Agency responsible for the extent of the damages.

The situation in Santa Cruz County is the same. Our risks are in large part engendered by the County of Santa Cruz's zoning policies and it leaves the County responsible for causing the

problem. Does the County really want to leave themselves this open to a lawsuit by angry land-owners when our wildfires happen?

So what are the owners of these smaller timbered parcels to do? Nobody wants the specter of that level of liability hanging over their heads and nobody wants to have land that cannot fiscally support itself. Many of these people may well opt to convert their land to other uses, including housing and other commercial endeavors that bring with them their own environmental changes. This will lead to deforestation of these areas, potentially increasing erosion and leading to subsequent water quality and land stability issues. These scenarios also need to be addressed in any Environmental Impact studies.

The Central Coast Forest Association urges the County of Santa Cruz to complete and publish a full Environmental Impact statement, with these issues at a minimum addressed.

Yours truly

Catherine Moore

CCFA Board Member