SEBASTOPOL WATER INFORMATION GROUP
a project of the OWL Foundation

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Subject: Scoping Comments for the preparation of a Draft EIR for "Preservation" Ranch, from Sebastopol Water Information Group
State Clearinghouse Number: 200802001

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A study of the monetary values associated with the various services that forests perform, was presented at an October, 2008, seminar, Commissioned by the EU, and headed by a Deutsche Bank economist, the study concluded that the global economy is losing between $2 and $5 trillion every year from deforestation -- far more than the total 2008 banking losses. The study leaders produced this figure by adding the value of forests for providing clean water and absorbing carbon dioxide, plus the cost of either replacing the forests or living without them.[1]

That soils sequester more carbon dioxide than vegetation is well-demonstrated (Figure 1). We can see that every land disturbance, whether natural or human-caused, releases CO_2, more from soils than from cutting trees. Forest soils are especially important for carbon sequestration.

To reach its goal of reducing greenhouse gas CO_2 emissions (GHG) by 25 percent below 1990 levels by 2015, Sonoma County's County Planning Commission and PRMD must require that environmental reviews of proposed projects include detailed studies, providing substantial data to support the assertions, of the total GHG balances (or imbalances) that the project will impose upon the County. The data must include estimates of the GHG contributions from all the road building, road maintenance, and extensive "restoration" program activities shown in the restoration figure, in the project section of the project plan.

Sonoma County's County Planning Commission and PRMD must not permit any project that will increase GHG emissions from soils, or reduce important GHG soil sinks.

The project called "Preservation" Ranch is sited in Sonoma County's largest relatively continuous forested acreage, and therefore the County's most valuable lands for maintaining and increasing its GHG sequestration potential. This project proposes to rezone 15,645 acres for timber resource exploitation, cut down timber or disturb grassland soils on another 1,861 acres to create a patchwork of vanity vineyards. As much as of 16,451 acres of forest soils would be exploited or disturbed for this project, while only 2,627 acres will be set aside for preserving biotic resources (and presumably the soils that they grow in?).

The DEIR for this project must assess the current CO_2 sequestration levels of all soils to be disturbed or removed (supported by well documented evidence) and provide methods for completely mitigating the GHG releases from the disturbed soils.

[1] The Economics of Ecosystems and Biodiversity: Towards a Green Economy
4th World Conservation Congress (IUCN Director General's Special Event), Barcelona, Spain, Oct. 6, 2008

Landslide surveys are not adequate to define the stabilities in an area slated for so much invasive "management," including tree removal, which obviously will require hundreds of miles of roads and extensive, long-term operation of heavy, petroleum-fueled vehicle-based equipment. The DEIR also must include a thorough stability study, conforming to State standards, of all slopes intended for logging of any sort; of slopes lower than the sites of tree removals for vineyard construction; and of all hill slopes where "all weather" roads are to be constructed, and (or) non-paved road maintained.

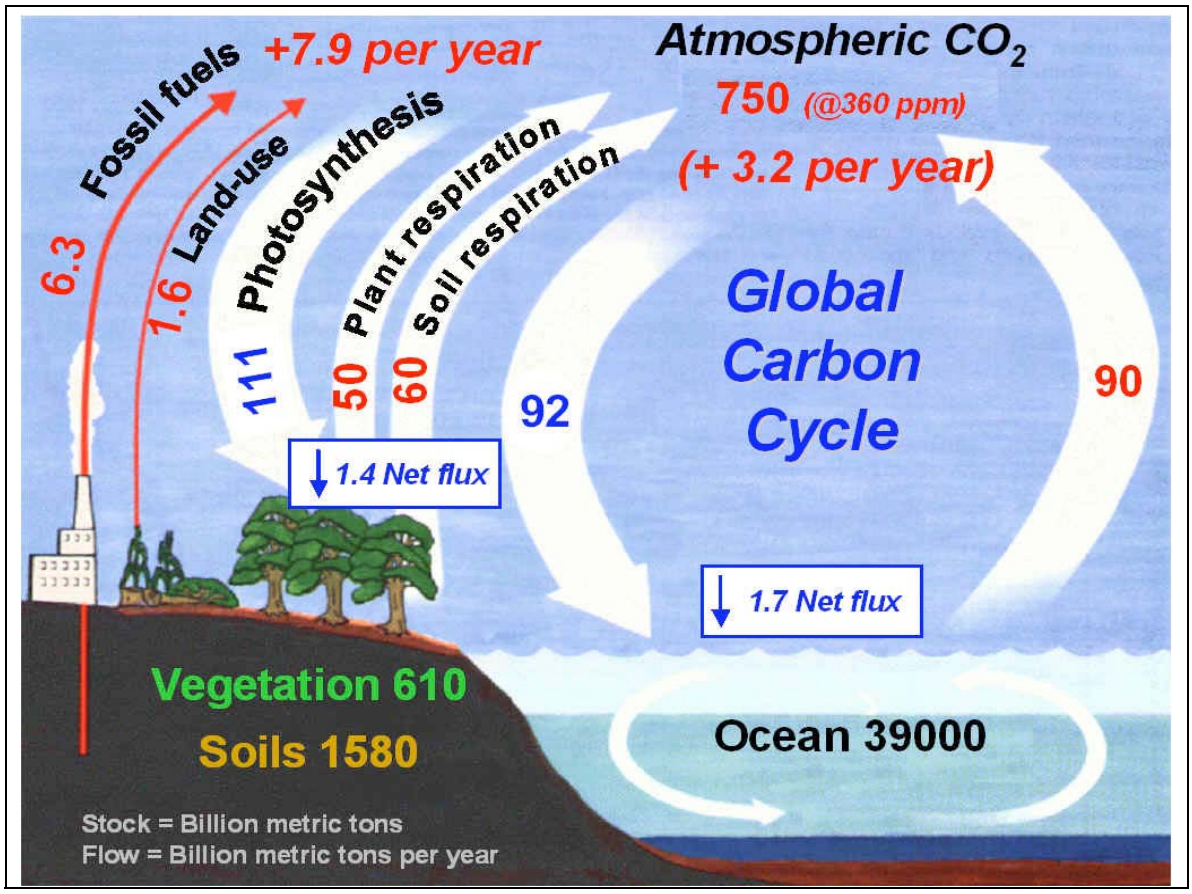

Figure 1. Ocean waters absorb the highest levels of CO_2, but eventually become acidified. On land, photosynthesis more than compensates for natural soil and plant respiration. Land disturbances release large amounts of CO_2, largely from soils, which sequester more than twice the level of CO_2 than vegetation. (The University of Michigan website)

The DEIR must provide detailed data to support the proposition that ridge tops and upper slopes are less biologically sensitive in Franciscan Formation terrain than other landscapes. Detailed stability studies, which conform to State standards, will be required to show that removing trees and roots from upper 20% to 38% slopes for constructing vineyards do not destabilize lower slopes and will not contribute to long-term stream pollution.

The DEIR must reject the project's concept of filling any watercourses. Instead the DEIR must thoroughly describe the disposal sites for any soils to be removed from ridgetops or upper slopes, detail the mitigations required for any disturbance to lower slopes or waterways, and detail the mitigations required for any destabilization of lower slopes, whether intentional or inadvertent.

The DEIR must also evaluate the materials which are to be mined on site for road "restorations," giving test results to support the adequacy of the specific Franciscan Formation materials for road building.

In other states the meaning of "in perpetuity" often turns out to mean "5 years." The DEIR must specify the steps to be taken for preserving the Windy Gap Preserve "in perpetuity" under a conservation easement. Land titles must be recorded to protect the lands over the long term.