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July 28, 2009

To: Mr. Allen Robertson
California Department of Forestry and Fire Protection
P.O. Box 94426
Sacramento, CA 94244-2460

Re: Fairfax Conversion Project Draft Environmental Impact Report (Draft EIR)

The Forest Protection Committee of the Redwood Chapter of the Sierra Club wishes to comment on the potential environmental effects of approving a Timberland Conversion Permit and Timber Harvesting Plan for the proposed Fairfax Conversion Project. We have been following the course of such vineyard conversion proposals for many years. We have the gravest misgivings about the environmental deficiencies inherent in the Fairfax proposal. We will outline some of our criticisms below.

Environmental harms: 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) harm to endangered species and habitat depletion l) aesthetic impacts m) increased infrastructure needs and costs (roads and increased traffic, emergency and fire services, etc.) n) the contribution of deforestation to global warming.

With particular regard to the last point: In 2006 Governor Schwarzenegger signed AB 32, which requires the California Air Resources Board (CARB) to develop regulations and market mechanisms that will ultimately reduce California's greenhouse gas emissions by 25 percent by 2020. We do not believe that this bar can be reached if the Department of Forestry and Fire Protection continues to approve the conversion of forest to development and agricultural uses at an alarming rate, using the such standards for carbon sequestration and GHG reduction as are exemplified in this DEIR, in the section of the DEIR titled "The Cumulative Contribution to Global Climate Change".

We note that the Department of Forestry recognizes the important role which forests play in carbon sequestration and in the lessening of global warming. For example CDF's 2003 FRAP Report, Chapter 5. Forests and Climate, states that " 'Human activities are influencing the

chemistry of the Earth's atmosphere in ways that are not fully understood but which could ultimately affect forest ecosystems in significant ways. The buildup of greenhouse gases is accelerated by fossil fuel burning, *deforestation*, livestock production, *agricultural activities*, and the widespread use and release of chemical compounds such as CFCs - (Report of the United States on the Criteria and Indicators for the Sustainable Management of Temperate and Boreal Forests, USDA Forest Service, 1997) [Emph. added]. The report continues "California's forests are an important contributor to global carbon cycles and act to help regulate climatic changes.... Forests play an important role in the earth's carbon cycle. On one hand, the loss of forests on a global scale to other uses (*deforestation*) *is responsible for up to one-third of carbon emissions to the atmosphere, and ranks second only to the burning of fossil fuels as a source of CO2 emissions*. On the other hand, *forests serve as a huge carbon sink*: they capture CO2 from the atmosphere through photosynthesis and store it as carbon in wood and other carbon-based compounds in soil, in understory plants, and in the litter on the forest floor. *Large amounts of additional carbon could be stored in U.S. forests, including those in California*. [Emph. added]."

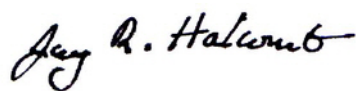
But in stark contradiction to CDF's own findings above, the Fairfax DEIR states that "the proposed project would have a ***less-than-significant*** impact on climate change. " Furthermore, this unwarranted claim is argued for with reasoning which is misleading, incomplete, and unclear. Employment of such a standard by CDF would allow for the approval of almost any deforestation/ forest conversion project.

For more detailed specifics of these concerns, please see the attached comments submitted by Professional Forester, Tom Gaman on behalf of the Forest Protection Committee.

" Government protection should be thrown around every wild grove and forest on the mountains, as it is around every private orchard, and the trees in public parks. To say nothing of their value as fountains of timber, they are worth infinitely more than all the gardens and parks of towns." - John Muir, founder of the Sierra Club

Future generations should never have to ask: "Why is Sonoma County part of the Redwood Empire?"

Sincerely



Jay Halcomb, Chair
Forest Protection Committee
Redwood Chapter, Sierra Club

Attachment: Review of Fairfax DEIR, "The Cumulative Contribution to Global Climate Change", by Thomas Gaman, Registered Forester #1776