



SONOMA ECOLOGY CENTER

Beautiful. Sustainable. Sonoma.

May 7, 2021

Regarding: Sonoma County Tree Protection Regulations

Dear Sonoma County Supervisors and Planner Doug Bush,

Many of Sonoma County's most strongly held values--scenic beauty, climate leadership, thriving natural areas, water security--involve trees. It is essential to retain larger trees for habitat, to sequester carbon, to capture water, and to retain shade to reduce flammability and protect soil moisture. The cumulative effect of tree protections must demonstrate a strong contribution to those values, not a subtraction from them.

Climate change mitigation: Protections should follow the science about how to achieve the carbon sequestration goals of the County. The cumulative net impact of the regulations must demonstrate that they further the County's climate goals, not detract from them.

Fire resilience: There is a lot of misinformation about trees and the risk of structures burning. The truth can be seen in the scientific literature and in the many photos of neighborhoods of burned houses surrounded by standing green trees. Large trees provide shade and wind breaks that can slow the spread of fire. Tree regulations must follow the science that shows that large trees and the shade they create must be retained in 100-foot defensible space, during fuels treatments, and in fuel breaks. Regulations should provide guidance that requires retaining large trees wherever possible. There should not be exceptions in the Tree Ordinance or other regs for fuels-related activities, except for example when trees overhang structures or come within 10 feet of chimneys.

Riparian protections: Tree regulations should be consistent with the Riparian Corridor ordinance, and should not create any exceptions to the Riparian Corridor ordinance. Shade over creeks and waterways is critical for wildlife habitat, and water quality. This is especially important, as our climate warms, to protect water resources and water-dependent biodiversity.

Effectiveness: It is important to not miss the forest for the trees. Having a canopy goal that is measurable and regularly published would help the County know if the tree regulations are effective or not in preserving our trees. There should be publicly visible milestones when the cumulative effect of tree protection regulations is reported. For example, what is the evidence that past or current regulations achieved their intended result?

Mitigation measures must be credible, proportional, readily understandable, enforceable, and actually enforced. The Tree Ordinance mitigation formula should be simplified, but also strengthened to achieve canopy goals. The number of mitigation trees

should be based on the cumulative diameter or circumference of the lost trees. To improve the success of mitigation measures, projects could pay into a fund, and get their money back if and when their mitigation trees achieve some level of success.

We urge Mr Bush to virtually convene a group of environmental stakeholders to discuss their input as a group. More brains think better than one. Invitees might include Kimberly Burr of Forest Unlimited, Denny Rosatti of Rosatti Consulting, Brock Dolman of Occidental Arts & Ecology Center, Kerry Fugett of Daily Acts, Tom Gardali from Point Blue, Ellie Cohen from Climate Center, and Minona Heaviland from Sonoma Ecology Center.

Thank you for your work on this topic. Few elements of Sonoma County's landscape better show how much we care about future generation than its trees.

A handwritten signature in dark ink, appearing to read 'Richard Dale', with a large, stylized flourish at the end.

Richard Dale, Executive Director
richard@sonomaecologycenter.org
(707) 888-1656

From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: The war on trees in Sonoma-county.org
Date: May 10, 2021 11:19:49 AM

From: Johanna Lynch <rrtimes@sonic.net>
Sent: Saturday, May 08, 2021 10:06 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: The war on trees in Sonoma-county.org

EXTERNAL

To: Doug Bush
Project Planner E.mail: Doug Bush@sonomacountyRe the Email received from Permit Sonoma Friday May 7 2021
Thank you for sending this information about tree protections to me here at the *Russian River Times*.

Over the years I have seen the treatment of trees in general change from enjoying big older trees in all kinds of environments throughout the county into staring at trees, many standing alone due to Tricky Tree “cleanups” and removal of what many loggers and tree- haters call "taking out a dangerous tree.” Beautiful trees with big crowns do not need to be killed; simply a crown trim typically about 3 feet.

Shopping for many of us who live in this county, driving into Santa Rosa depends on how much shade there will be outside the malls, the complexes and the retail sites .

When I and my friends go shopping, parking can become an hour-long trial by heat!

Some barren cement-parking places are so hot, no animal can survive inside a parked car for more than fifteen minutes.

If we can't park and shop during the blistering summer months, does that affect the revenues?

What I and my friends would like to see is not only more plantings of sturdy trees—Native or not— to flourish with water provided for enough waterings (around the roots only), with 2-inch mulch around the roots to keep the roots cool. The water wasted with toilet flushings could be changed into flushing gray water. Cut down on giant Cannabis- growers watering twice weekly and not being gardeners and knowing little about roots of olives, grapes, and/or big trees.

We dine out about twice every week and only go to coffee shops if there is a patio shaded by trees and/or awnings. Trees clean the air and provide safe habitats for local birds. Yes. I am a birder too.

The hatred I hear from neighbors and others throughout the county re how trees are dangerous and feed fires, is echoed by “Brush removal” grant-funded amateurs.

To many of them “brush” includes Willows shading creeks and ponds throughout the county of Sonoma.

A neighbor (nitwit) of mine who was a landscape gardener I call him a Land-scraper who talks of the magic of what Roundup can do re killing weeds, hired a two-man crew to “cut down every tree” on his property; later gloating at our HOA meeting about this gruesome work which included destroying Alders, 60-year old Oaks and other beautiful healthy trees.

Too late I told him the erratic strong winds blowing through this area for the first time might be related to the removal of big stands of trees, including very old Redwoods.

He sniffed and told me I was “foolhardy.”

The war on trees suits the loggers very well. How many singed Redwoods have to be cut down and trucked to the mills to make a lotta money?

Three or four trucks are rolling through Guerneville every hour daily. More and more locals are complaining about

the sneaky tree-cutters making money off our forests.

Students in the public schools no longer learn to write a letter, put together a composition and/or a thesis, recognize a map of another country, and they do not learn anything about cultivating healthy, trees . Why?

To the trenches to kick up some dust and get more trees into towns and cities.

Begging you to try to initiate more protection for all the trees. The crooks love it when you talk about saving “only Native Trees.”

Please Insist that Davy Tree and other companies in the biz of cutting down healthy beautiful trees get more training re mulching around the tree roots and NOT spraying

Roundup, which eliminates the entire food sources of food for birds.

No weeds! No birds on a property, which means Sudden Oak death arrives along with other critters free to eat bark and kill trees. It is a real Duh! Relationship.

Trees do not like to stand alone; they thrive with lots of trees around them. And Hey! the trees make Oxygen!

The birds in Sonoma County have nowhere to go; let alone enjoy the day.

Thanks for listening

Johanna Lynch

Russian River Times

rrtimes@sonic.net

707 847 3190

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: Forest Unlimited. Fwd: Tree Ordinance letter to the Supervisors
Date: May 10, 2021 11:20:11 AM

From: Larry Hanson <larryjhanson@comcast.net>
Sent: Sunday, May 09, 2021 6:44 PM
Subject: Forest Unlimited. Fwd: Tree Ordinance letter to the Supervisors

EXTERNAL

FROM:
Forest Unlimited
PO Box 506 • Forestville CA 95436
707-632-6070

May 5, 2021

Dear Supervisors and Staff:

We are writing on behalf of our approximately 1500 Forest Unlimited supporters. We have worked locally for over 25 years to protect watersheds from irreversible impacts of irresponsible logging and planted over 34,000 redwoods on protected properties with hundreds of volunteers.

Forest Unlimited members are participating and watching the County's current effort to update the tree protection policies. In that spirit, while the existing tree policies are reviewed and a new policy adopted, we urge the County of Sonoma to act swiftly and cease issuance of tree removal permits to prevent further destruction of trees, woodlands, and forests. As climate science tells us, existing trees are a large part of the climate saving-equation drawing down large quantities of the harmful carbon we continue to emit in large quantities (*Intergovernmental Panel on Climate Change, Moomaw, Ph. D. et al. Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves Greatest Good*).

Science tells us that we have only ten years for making significant gains. Trees that are 10 years or older translate into time, this is the time we need to make the necessary adjustment to mitigate climate change impacts. Therefore, all trees at least 10 years of age must be preserved across the county's landscape. Protected trees will provide substantial services to the community and future generations.

Major Long-term Economic and Community Safety Considerations

* Climate change is adversely affecting our existing community, our farms, and our watersheds;

- Reversing climate change is of the highest concern and effective measures to contribute to that effort must be implemented;
- Drastic reductions in emissions and drawing down carbon are critically important in that effort;
- Existing trees drawdown carbon immediately and on a large scale;
- Compromising our ability to drawdown carbon should not be an option at this time;
- Existing woodlands, forests, and trees must be preserved with minor exceptions (e.g. trees close to homes);

The Protection of Trees

Currently, Sonoma County permits large numbers of tree removal proposals on a yearly basis.

This is true despite the many valuable functions trees provide to the community including:

- Protection of our shared clean water supply insofar as woodlands of all sorts help infiltrate water into the aquifers for well owners and stream flows, reduce soil erosion by protecting soils from runoff of stormwaters, and help moderate soil heating and soil loss from extreme solar exposure deep ripping, etc.;
- Mature trees are more fire resilient;
- Trees provide free services to the community and are better than “shovel ready” because they are doing critical work for us already;
- Mature trees sequester by far more carbon than seedlings and saplings;
- Woodlands support very high levels of biodiversity which is critical to humans as well as other species;
- Protecting trees safeguards soil and groundwater through their deep root structure and works in combination with canopy shade that also provides micro-climate enhancement;
- Trees create wet weather systems that we need on large and small scales; and
- The upper canopy of woodlands cool the soil below and facilitate absorption of rainfall into the ground for human and other uses.

Actions Required

- Refrain from issuing tree removal permits until such time as the County has in

place a Comprehensive Tree Protection Policy that is based on the latest climate science;

- Create County policy so that mature trees are of the highest value to the health and safety of our community in the fight to rein in climate change.
- Ensure that the new policy is fair—projects and proposed activities will be treated the same and existing mature trees, woodlands, and forests will be presumptively protected;
- The County should look at narrow exceptions for creating reasonable defensible space around individual homes for fire protection (see Jack Cohen, Ph. D.);

Forest Unlimited has, and especially now, views all mature trees as highly valuable and urges the County of Sonoma to move forward a comprehensive and climate appropriate protection policy that honors our children and begins the long process of mitigating past and ongoing development activities.

We look forward to a successful update process that is based on the climate science.

Sincerely,

Larry Hanson
President of the Board of Directors
Forest Unlimited

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: County tree ordinance update
Date: May 10, 2021 11:20:24 AM

-----Original Message-----

From: Michael Krikorian <thekriks@sonic.net>
Sent: Sunday, May 09, 2021 11:55 PM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: County tree ordinance update

EXTERNAL

As a 50 year resident of Sonoma County, I would like to express my strong concern that more needs to be done to protect the remaining oak woodlands as well as remaining redwood groves. Between the drought, conversion to vineyards, fires, sudden oak death and invasive species, our woodlands have taken a beating. What remains needs maximum protection, especially when we now know that mature trees tend to do the most when it comes to pulling in and binding CO2 from the atmosphere.

Other than trees needing removal to protect dwellings, I would like to see special efforts to protect the trees we have left.

Thank you, Michael Krikorian

738 Willowood Way

Windsor, CA 95492

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: Trees are essential
Date: May 10, 2021 11:21:01 AM

From: Tanya Constantine <tanya@tanyaconstantine.com>
Sent: Monday, May 10, 2021 9:31 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: Trees are essential

EXTERNAL

Hello, Doug!

I am writing to you to bring to your attention the necessity to maintain as many trees as possible to combat climate change. I think there are a lot of people out there who don't know that the future of the planet depends on saving trees, not getting rid of them. I notice the indiscriminate felling, when the trees still have life, for aesthetic reasons. At this point, it is unconscionable for people to be getting rid of trees because they're in the way. I understand that it's imperative that to maintain trees, they need to be pruned. But not to be felled, if at all possible. Please do your best to communicate to your people that they need to make every effort to protect the trees that are up, and to plant new ones. I want my greatgrandchildren to be able to breathe. It is very important for the planet to be a safe environment for people to continue living on it.

Thank you for your attention to this matter.

Sincerely,

Tanya Constantine
tanya@tanyaconstantine.com
(415) 726-7245

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: importance of trees
Date: May 10, 2021 11:20:37 AM
Attachments: [Ltrr to Supes on Tree Ord.pdf](#)

-----Original Message-----

From: Kenneth Smith <kensmith@sonic.net>
Sent: Monday, May 10, 2021 8:26 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: importance of trees

EXTERNAL

Dear Doug Bush,

Please give the highest priority to protecting our trees and forests. I am a long-time resident of Forestville (43 years living at 6636 1st Street).

Larry Hanson, a friend of mine, has written a persuasive letter I am sure you have read (attachment below).

Ken Smith

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: The Tree Ordinance
Date: May 11, 2021 9:16:14 AM

From: Chris Poehlmann <chrispoehlmann@gmail.com>
Sent: Tuesday, May 11, 2021 9:11 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Cc: Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; Leo Chyi <Leo.Chyi@sonoma-county.org>
Subject: The Tree Ordinance

EXTERNAL

Dear Supervisors;

I would like to urge you to update the tree ordinance so that the importance of protecting trees, forests, and woodlands for safeguarding our water sources and for mitigating climate effects is maximized.

Climate change and its consequences are arguably the biggest existential threat to mankind and life on earth. Any foreseeable levels of reductions in greenhouse gas emissions will not be enough to meet the conservative maximum target (2.0°C and under) that climate scientists say is needed. We need to additionally increase carbon sequestration in existing forests, wetlands and soils. This study (link below) points to conserving the existing bigger trees in existing healthy forests as a best method to meet the needed target reductions. The term to describe this approach is “Proforestation.” The principal author has been a lead author of five Intergovernmental Panel on Climate Change (IPCC) Reports.

<https://www.frontiersin.org/articles/10.3389/ffgc.2019.00027/full>

Please review this science and use it to craft the best tree ordinance possible.

Regards,
Chris Poehlmann
Annapolis

Chris Poehlmann
chrispoehlmann@gmail.com

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: Protecting our trees
Date: May 12, 2021 7:58:30 AM
Attachments: [Outlook-top4ba5h.png](#)

From: Mary Bates Abbott <mba531@outlook.com>
Sent: Wednesday, May 12, 2021 6:38 AM
To: BOS <BOS@sonoma-county.org>; Doug Bush <Doug.Bush@sonoma-county.org>
Subject: Protecting our trees

RE: tree policy

I would like to go on record to say that I believe we need to enact a strong, vital tree protection ordinance in the County. Our precious oaks in particular are a keystone species, vital to our health and well-being, the health and well-being of all other native species in the county. We have already lost so many trees to fire, and in those areas, so much logging is already going on.

Please, stop the clearing of our trees. Removing trees for economic development is so short sighted. Protecting our trees takes a long view of protections for all.

Sincerely,
Mary Abbott
444 Vine Ave
Sebastopol 95472

Also, own property on Seaview Ridge Road

Mary Bates Abbott

Sent from my toaster oven.



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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: For the Board meeting on May 18th
Date: May 12, 2021 11:29:53 AM

From: Tanya Constantine <tanya@tanyaconstantine.com>
Sent: Wednesday, May 12, 2021 10:59 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: For the Board meeting on May 18th

Hello, Doug,

Please implement policy that stops the clearing of county woodlands. We need trees to draw down our pollution fast. Sacrificing trees during this important effort does not make any sense. Saving our shared woodlands costs nothing and has immediate and vital on-going benefits.

Thanks for your attention to this very important matter.

Sincerely,

Tanya Constantine
(415) 726-7245
tanya@tanyaconstantine.com

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From: [redacted]
To: [redacted]
Subject: rfw: Tree Ordinance Comments
Date: May 12, 2021 9:06:00 AM

It looks like this already went to the board but still wanted to forward to you just in case.

From: Sara <sarajharris@comcast.net>
Sent: Wednesday, May 12, 2021 8:30 AM
To: BOS <BOS@sonoma-county.org>; Marcie Woychik <Marcie.Woychik@sonoma-county.org>; Doug Bush <Doug.Bush@sonoma-county.org>
Subject: Tree Ordinance Comments

EXTERNAL

Dear Board of Supervisors and all Involved,
As you gather soon to make vital decisions about the future of Sonoma County trees, I would like my voice to be heard, as a longtime citizen of downtown Forestville.

We are at a critical point and our trees play a very important role. I believe their place in the work we do around our climate future has been very overlooked in the service of development. ALL of the latest research points to the fact that trees are a lynchpin in carbon sequestration, Clearing county woodlands, including such examples of old oaks being felled in the Laguna, is like saying we are a fairly progressive, green county and then slapping a Trumpian type of short-sighted, destructive behavior right over that pretty picture. This county did NOT elect Trump. Why does our policy around forests and trees look like we did elect him?

Sonoma County could become a leader, a beacon of light, in protecting our county trees. There is no lack of scientific evidence that this is essential. This is not at all about just planting new trees. It is about updating the tree ordinances to reflect current science and to take an active role in working with the truths and cycles of nature and how trees play such a role in climate change.

The current Sonoma County Tree Ordinance policy (1986) is scientifically outdated and severely undervalues the importance of trees and woodlands to people, to wildlife, and to the critical struggle to reverse the climate crisis. I am asking that a moratorium on tree cutting be declared while policies are updated. Do not give into the false narrative that trees must be massively cleared to prevent fires.

We are lucky enough to have trees left to save. Many places no longer do! Let this county become a leader in Climate Policies that work WITH nature.

With gratitude for your hard work and your careful attention to this issue,

Sara Harris

6636 1st St/Forestville/95436

photo taken in Sonoma county!



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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: tree policy
Date: May 12, 2021 7:57:18 AM

From: Angelica Jochim <angelica.jochim@gmail.com>
Sent: Wednesday, May 12, 2021 7:17 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: tree policy

Hello,
Please:

1. Pass a policy that recognizes the huge importance of trees to help draw down the carbon we continue to push into the atmosphere...Reducing emissions is NOT enough. "We will need to commit to removing carbon that is already in our atmosphere if we want to move fast enough to become carbon neutral by 2030." Sonoma County Regional Climate Protection Authority

2. Please implement policy that stops the clearing of county woodlands. We need trees to draw down our pollution fast. Sacrificing trees during this important effort does not make sense. Saving our shared woodlands costs nothing and has immediate and vital on-going benefits.

"Given that land use change, predominantly from forest conversion, contributes substantially to global CO2 emissions, conserving Sonoma County's native habitats is an important element in the portfolio of climate action. " Ag and Open Space

Thank you,

Angelica Jochim

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: trees
Date: May 17, 2021 7:56:06 AM

-----Original Message-----

From: Forrest <fj@monitor.net>
Sent: Monday, May 17, 2021 7:37 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: trees

EXTERNAL

Dear Board of Supervisors,

SAVE THE TREES!! Let the trees live and breathe, stop the cutting.

Forrest & Eileen Jang
Bodega

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: May 18, 2021 Tree Protection ordinance update
Date: May 17, 2021 8:01:12 AM
Attachments: [Tree Protection May 2021.pdf](#)

It looks like this PDF was already sent to all supervisors but sending to you just in case we need to provide it.

From: Wendy Krupnick <wlk@sonic.net>
Sent: Sunday, May 16, 2021 9:53 PM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Cc: district5 <district5@sonoma-county.org>; district3 <district3@sonoma-county.org>; district4 <district4@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>
Subject: May 18, 2021 Tree Protection ordinance update

Dear Mr. Bush,

Community Alliance with Family Farmers, (CAFF), Sonoma County is submitting the attached comments for the May 18, 2021 workshop on updating the County Tree Protection ordinance.

Thank you for including our comments in your public input and for considering them.

With best wishes,

Wendy Krupnick, Vice-president, CAFF Sonoma County

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May 16, 2021

Doug Bush, Planner III
County of Sonoma, Permit Sonoma
Re: Comprehensive Tree Ordinance Update

Dear Mr. Bush,

The Sonoma County Chapter of Community Alliance with Family Farmers (CAFF) would like to thank the Board of Supervisors and Permit Sonoma for moving forward with updating the County Tree Protection Ordinance. This update has been long overdue. Along with many other groups and individuals, we have been sounding the alarm about the loss of mature trees and their surrounding ecosystems, especially the destruction of acres of oak woodland, for many years. We have previously requested, and do so now, that a moratorium be placed immediately on removal of mature trees and clearing of oak woodlands until the revised ordinance is approved.

CAFF promotes ecological farming techniques, including practices that sequester carbon, improve soil organic matter content, reduce erosion and sediment loss, enhance nutrient cycling, increase soil water holding capacity and infiltration, support and sustain biodiversity, and increase resiliency to drought and weather extremes. Native trees provide all of these functions and are a critical part of healthy agricultural ecosystems.

We appreciate the increased recognition of the value of these ecological farming practices locally and State-wide in recent years. The support and resources provided by programs like the California Healthy Soils Initiative and those offered by the RCDs and NRCS have encouraged even more farmers and ranchers to expand and modify practices that conserve the land and sequester carbon. It has been disconcerting to see removal of carbon-sequestering trees and thereby defeat the progress we can make in that regard. This allowance seems both ill-advised and self-defeating.

To preserve the trees where they stand, and to supplement their innate capabilities with additional climate-beneficial farming practices is in accordance with the County's climate goals. A holistic and comprehensive approach to climate resiliency can only happen if the trees themselves are given increased levels of protection, which the Tree Ordinance is uniquely positioned to do. It is incumbent on these combined and cumulative efforts for us to succeed in combatting the most devastating effects of climate change.

We are responding below to the questions posed for the May 18, 2021 workshop:

Are current rules sufficient to meet the county's adopted natural resource protection goals?

It is clear that current rules are *not* sufficient as evidenced by the extensive loss of mature native trees and oak woodlands in our county. Much of the siltation of our rivers and streams has resulted from tree removal. There is increased run off and flooding during storms and loss



of habitat is surely exacerbating the significant decrease in populations of songbirds, insects, and other species.

How should we define success when it comes to native tree protections?

Successful native tree protection would be indicated by increase in acreage of healthy stands, woodlands and forests and their surrounding ecosystems, specific to each dominant species of trees. For example, oaks would have increasing natural regeneration so oak woodland acreage would increase and have trees of all ages in them. However, young Doug fir trees would be controlled resulting in fewer and much older trees spaced much farther apart with many other species present between trees.

Are certain trees species, or trees in particular areas more important than others?

Oaks and their habitats are among the most critical for California's native biodiversity, including some 2,000 plants as well as 5,000 insects, 80 amphibians and reptiles, 160 birds and 80 mammals. They capture and hold massive amounts of carbon, prevent erosion and increase water infiltration significantly. They are perhaps the most resilient trees to drought, flood and fire. As a UCANR study states, "Conifers maximize growth; oaks maximize persistence." We are lucky to have both in our county and should value each in their unique niches. Species that are particularly flammable and weedy, such as acacia, eucalyptus and young Doug fir, should not be protected and in many cases should be removed in favor of oaks and other more resilient native trees.

Should we continue to exempt most construction and agricultural operations from tree protections?

The exemption from most tree protections for ag and construction operations must be halted immediately. By far the most extensive loss of mature trees, forest and woodland habitat has been due to these activities and there are no justifications for the exemptions to continue. Addressing the climate crisis requires that all carbon stores be preserved and increased while simultaneously cutting carbon emissions as fast as possible. This means halting most new development that would remove carbon capturing trees and plants and supporting natural regeneration and planting of appropriate species, especially native shrubs and trees.

We ask that you move forward quickly with updating relevant existing ordinances and implement an immediate moratorium on further large tree removals to prevent a rush of tree cutting in anticipation of these much-needed restrictions.

Thank you for considering our comments.

Wendy Krupnick

Vice president, CAFF Sonoma County

cc. Chair Hopkins and Supervisors Coursey, Gore, Gorin and Rabbitt

To: Doug Bush, Planner III
County of Sonoma, Permit Sonoma
2550 Ventura Avenue
Santa Rosa, CA 95403
doug.bush@sonoma-county.org

Date: May 16, 2021

Re: Proposed Tree Ordinances for Sonoma County

On behalf of the Milo Baker Chapter (Sonoma County) of the California Native Plant Society, thank you for the opportunity to share our comments on the proposed changes to the Tree Ordinance for Sonoma County. The Milo Baker Chapter is dedicated to protecting native plants and their habitats in Sonoma County. Many of these habitats are imperiled from development including native grass prairies, valley oak woodland, vernal pools and other wetlands. While most tree species in Sonoma County are not endangered or rare, they do play an important role. Trees are long-lived species and a great display of our County's natural heritage; they also enhance scenic vistas, provide habitat for many other species, and enhance critical ecosystem functions like groundwater recharge and prevent wind erosion of topsoil. In addition, trees have important carbon sequestration value.

Following are the Milo Baker Chapter of CNPS' comments to the questions from County of Sonoma Staff:

Sonoma County: Are current rules sufficient to meet the county's adopted natural resource protection goals?

Milo Baker: There is a wealth of evidence that shows that current rules and proposed rules do not meet the natural resource protection goals. Trees are being removed throughout the County with no oversight or mitigation requirements. Numbers of trees and acres of woodland have decreased dramatically in the past 30 years. Agriculture is moving out of traditionally zoned ag land into forested and oak savannas in the Rural Resource area zoned property, through VESCO and other projects allowing ministerial permitting. The charts used for measuring trees removed and retained do not provide enough protection as it is on a site-by-site basis. In addition, the weighted values for Diameter at Breast Height (dbh) doesn't provide for the condition of the tree itself.

We recommend that the County assess the overall acreage of woodlands and other forests, then provide a projected loss in acreage over time based on predicted development, whether it be from construction development or agricultural development (i.e., vineyards, cannabis and conversions).

In the future, specific criterion about the stands, woodlands and forest should be included, such as stand/woodland/forest composition, distribution of oak species, tree cover and density, stand/woodland/forest size and connectivity, and interfaces of the stand/woodland/forest regarding development. Much of this data is already available through the Ag and Open Space District's dataset for the County; the Sonoma Veg Map (Sonomavegmap.org). The California Native Plant Society provided expertise in this 5 year effort with other advisors. With additional data, this information goes a long way to understanding current resources and in planning future priority land uses.

In addition, resources need to be allocated to improving enforcement of existing rules. In some cases, woodlands are cleared before agricultural permit applications are begun. Developing guidelines for vegetation treatment for fire control is also an emerging and urgent need in the county.

How should we define success when it comes to native tree protections?

The current mitigations for tree removal are insufficient. As many species take more than 40 years to create a good canopy and healthy soils associations, any mitigation measures (such as the current popular planting in-kind by species) should not be measured as fully mitigated until the forest has become established as a community.

Once there is an overall acreage of the various tree communities, the County can identify the success measurements. A Sonoma County Woodland Conservation and Enhancement Plan should be created to evaluate woodland mitigation opportunities that arise as a result of land conversion, including infrastructure expansion or urban and rural development. Such a plan can go into details that will determine success of native tree protections.

Are certain trees species, or trees in particular areas more important than others?

In general, protection of individual trees is benefitting the tree more than the vegetation community or habitat. As a result, we propose identifying important vegetation communities, such as stands, woodlands and forests. We have provided the following definitions for easier understanding of these terms.

"Stand" means an individual tree or a grouping of contiguous trees that occupy less than one acre of area where the dominant trees are of one species.

"Oak Woodland" means a grouping of trees over one acre in area growing in a contiguous pattern and on a site of sufficiently uniform quality that is distinguishable as a unit, including any Stand within 500 feet; where the dominant trees are one or more of the following species: Blue oak (*Quercus douglasii*), coast live oak (*Quercus agrifolia*), interior live oak (*Quercus wislizeni*), valley oak (*Quercus lobata*), and California black oak (*Quercus kelloggii*).

"Mixed Evergreen Forest" means a grouping of trees over one acre growing in a contiguous pattern with a canopy greater than 60% and on a site of sufficiently uniform quality that is distinguishable as a unit, including any Stand within 500 feet; where the dominant trees are one or more of the following species: Canyon Live Oak (*Quercus chrysolepis*), Black Oak (*Quercus kelloggii*), Coast Live Oak (*Quercus agrifolia*), Madrone (*Arbutus menziesii*), Bigleaf Maple (*Acer macrophyllum*), California Bay (*Umbellularia californica*), Christmas Berry (*Heteromeles arbutifolia*), Coulter Pine (*Pinus coulteri*), Tan-Bark Oak (*Lithocarpus densiflora*), California Hazelnut (*Corylus californica*), Coffeeberry (*Rhamnus californica*).

Conservation and enhancement efforts should seek to conserve and maintain the full diversity of species present in the county. As threats change over time, these efforts may change as well.

Should we continue to exempt most construction and agricultural operations from tree protections?

No, construction and agricultural operations are removing the largest acreages of stands, woodlands and forests in Sonoma County. As a result, we should NOT exempt them from tree protections. However, we do not have a comparison of what is present versus what is lost. We have little historic information on woodland composition, woodland condition or other factors to fully assess woodland values. The Yolo County Tree Ordinance from 2007 provides good information on the priority for conservation and enhancement.

We are recommending that a broad-based ecosystem approach be taken for protecting and perpetuating biological diversity for forests and especially oak woodlands. In order to achieve this, acreages of each

forest type needs to be examined. The Sonoma County Ag and Open Space District has most of this data from 2012-2017.

We recommend that Permit Sonoma work with Ag and Open Space to determine Sonoma County's relative abundance of forests by forest type including: redwood forest, Doug fir forest, mixed conifer, and oak woodlands by conducting an updated vegetation analysis of all habitat types, to provide a broad stroke analysis of current acreages using ARCGIS. Furthermore, the County could look at the relative abundance of these forested acres in the various zoning types, to evaluate the potential impact of ministerial permits in the different zoned lands. The County may find that if ministerial permits are only applied to currently zoned agricultural properties there would be less of an impact than if the ministerial permits extended to Rural Resource zoned parcels. Understanding the impacts of planning decisions should come before policy adoption.

Once the analysis of how the landscape is changing, then a broad-based ecosystem approach through collaboration and cooperation of numerous private and public partners can be achieved.

This inventory of forests can then be used as a basis for an overall assessment of risk to any particular forest type, for instance, oak resources. A few of the categories that should be evaluated include:

- Activities causing net loss of oak woodlands
- Activities causing fragmentation of functional habitats
- Impacts to family farming operations
- Activities affecting land values

The evaluation of oak woodlands and their risks can then be used to track projects and the effects of those projects on the County resources of oak woodlands. The inventory system might include:

- Listing of approved projects
- Listing of denied projects
- Determination of project impacts (e.g., acres lost)
- Listing of mitigation measures

In summary, the Milo Baker (Sonoma County) Chapter of the Native Plant Society believes that it is incumbent on the County to increase protections for trees and forests throughout the County to meet the requirements for tree protections in the General Plan. In a prior comment letter, the Milo Baker Chapter called on the County to instigate a tree cutting moratorium. We are encouraged that the Board of Supervisors is tackling this issue. Our organization is willing to support reviewing and analyzing data, setting up realistic goals, and supporting the overall health and resiliency of our County by protecting our native forests.

Regards,



Wendy Smit, President

Milo Baker Chapter of the California Native Plant Society

From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: Tree Ordinance
Date: May 17, 2021 8:06:35 AM

From: Jennie Rose <jenstone@sonic.net>
Sent: Sunday, May 16, 2021 10:10 AM
To: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: Tree Ordinance

Hello,

I am writing you on behalf of the trees in Sonoma County and asking that you please pass a policy that recognizes the huge importance of trees to help draw down the carbon we continue to push into the atmosphere...Reducing emissions is NOT enough. "We will need to commit to removing carbon that is already in our atmosphere if we want to move fast enough to become carbon neutral by 2030." (Sonoma County Regional Climate Protection Authority).

Also, please implement policy that stops the clearing of county woodlands. We need trees to draw down our pollution fast. Sacrificing trees during this important effort does not make sense. Saving our shared woodlands costs nothing and has immediate and vital on-going benefits. "Given that land use change, predominantly from forest conversion, contributes substantially to global CO2 emissions, conserving Sonoma County's native habitats is an important element in the portfolio of climate action." (Ag and Open Space).

Thank you very much.

Jennie Rose

Bodega, CA

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From: [Doug Bush](#)
To: [Chelsea Holup](#)
Subject: FW: Future Updating of Tree Ordinances for Sonoma County
Date: May 17, 2021 7:56:51 AM
Importance: Low

It looks like this one already made it to the supervisors but sending to you just in case.

From: judith Rousseau <jrousseau12@hotmail.com>
Sent: Sunday, May 16, 2021 10:24 PM
To: Lynda Hopkins <Lynda.Hopkins@sonoma-county.org>; David Rabbitt <David.Rabbitt@sonoma-county.org>; Susan Gorin <Susan.Gorin@sonoma-county.org>; Chris Coursey <Chris.Coursey@sonoma-county.org>; James Gore <James.Gore@sonoma-county.org>
Cc: Doug Bush <Doug.Bush@sonoma-county.org>
Subject: Future Updating of Tree Ordinances for Sonoma County
Importance: Low

I am concerned about the way the County has framed native tree protection. Putting a primary focus on trees by their size does not take into account the significant value of established ecosystems like Oak Woodlands and Mixed Evergreen Forests. These living systems provide so many benefits, including preserving habitat for biodiversity, erosion control, water quality and carbon sequestration.

Sonoma County has no history of assessing the size and composition of our remaining woodlands and forests, nor do we keep track of the acres of such habitat we have lost to development. This will require a thorough vegetation analysis of our remaining woodlands and forests. Only then, will we know what is being lost.

I fervently hope we will reevaluate and enlarge our understanding of our *Working Woodlands* and then begin to look at the big picture for our future.

Sincerely,

Judith Rousseau
Graton

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