



December 9, 2008

Honorable Mike Kerns, Chairman
Board of Supervisors
County of Sonoma
575 Administration Drive, Building 100A
Santa Rosa, CA 95403-2887
FAX (707) 565-3778

Re: Ordinance amending Sonoma County Code to consolidate all grading, drainage and vineyard and orchard development related code provisions into one comprehensive chapter.

Dear Chairman Kerns and Members:

The Friends of the Mark West Watershed (FMWW) is a community of neighbors, landowners and supporters working to protect, restore and sustain the Upper Mark West Watershed in Sonoma County, California. Our watershed continues to provide spawning and rearing habitat for Coho Salmon and Steelhead Trout. We make our decisions by consensus.

On November 13th, the FMWW appeared before the Sonoma County Board of Zoning Adjustments in opposition to a new winery proposed for the Upper Mark West Watershed. We were told that the adverse environmental impacts of the vineyards planted to provide grapes to the proposed winery were not relevant to the hearing, despite clear documentation that the overall project has already significantly adversely impacted the capacity of Mark West Creek to provide habitat for the continued spawning and rearing Coho Salmon and Steelhead Trout (see www.markwestwatershed.org for permit documents and comments submitted by FMWW and others).

Approval of this proposed grading ordinance will continue this apparently intentional circumvention of CEQA's requirement that project approvals be granted only after considering the environmental consequences of the project "as a whole" rather than considering a series of multiple permits and piece-mealed approvals. The ordinance seems to assume that the only conceivable adverse impacts resulting from the conversion of natural habitats, including oak woodlands and endangered chaparral, into orchards and vineyards, is its potential to cause erosion and sedimentation. Nothing could be further from the truth.

The destruction of natural habitats and their conversion to orchards or vineyards, in addition to causing significant sedimentation, results in the loss and fragmentation of highly valued and endangered natural habitats, takings of listed species, damage to archaeological resources, changes in site run-off and hydrologic characteristics, increased consumption of water resources

and the diminution of late season stream flow (directly impacting the survival of threatened and endangered salmonoids), displacement of wildlife and the elimination of food sources and nesting locations, and multiple additional impacts, none of which are considered or evaluated pursuant to the proposed ordinance and almost none of which are addressed by the proposed “Best Management Practices.”

It seems inconceivable that the Board of Supervisors could even consider this proposed ordinance, with its total circumvention of any meaningful environmental review and public disclosure and participation, to be consistent with the open space and resource protection goals and policies of the County’s General Plan. If we do not implement the environmental goals of our General Plan in our project specific permit processes, then just when do we do so? The ordinance in its current form directly undermines the efforts of the County’s own Water Agency and the many other state and federal agencies heavily invested in the restoration of salmon in the Russian River Watershed.

The County seems to believe that there are only two kinds of land in Sonoma County: Urban Land and Agricultural Land. This ignores the fact that much of Sonoma County’s non-urban designated lands are a part of our natural infrastructure; that part of the landscape that provides the ecological services of oxygen production, carbon dioxide sequestration, ground water and surface water replenishment, biodiversity maintenance, fish and wildlife sustenance and the many other natural functions upon which we all depend. The County must protect these resources from the unconsidered and unregulated destruction perpetuated by this proposed grading ordinance.

The Friends of the Mark West Watershed respectfully request that the Board of Supervisors set aside this proposed ordinance and direct Staff to develop a proposal that is fully compliant with the impact identification, evaluation, mitigation and disclosure requirements of the California Environmental Quality Act. Any proposal for the regulation of the conversion of natural habitats to orchards and vineyards must include some reasonable way for screening the whole of proposed projects for the full range of environmental consequences and adverse effects and assuring their adequate mitigation.

Sincerely,

Harriet Buckwalter, Co-Chair for the
Friends of the Mark West Watershed

Linda Sartor, Co-Chair for the
Friends of the Mark West Watershed

Copies:
Members, Board of Supervisors
California Department of Fish and Game
North Coast Regional Water Quality Control Board