

January 11, 2016

Steve Dworetzky and Members San Mateo County Planning Commission 455 County Centeer, 2nd Floor Redwood City, CA 94063

Re: Item #3 on the January 13, 2016 Agenda: General Plan Map Amendment from Open Space to Timber Production, and Rezoning from Resource Management (RM) to Timberland Preserve Zone (TPZ), PLN2014-00459, APN 085-170-010

Dear Chair Dworetzky and Planning Commissioners,

Thank you for continuing this item in order to allow time for the required Timber Management Plan (TMP) to be submitted, per Zoning Regulations Section 6721.

CGF has reviewed the September 15, 2015 TMP prepared by Joseph Culver, Registered Professional Forester. CGF is concerned that there is insufficient clarity in the TMP regarding long-term protection of the old growth (late seral) redwoods on this property.

According to the previously submitted (and subsequently withdrawn) Nonindustrial Timber Management Plan (1-10NTMP-006SMO) for this property, there are "30 large, older redwood trees with basal hollows, and 30 large older redwood trees with other defective characteristics" on the property. The 2015 TMP characterizes these trees as "residual growth trees". Residual growth is a term used to denote trees that remain after commercial harvesting; in this case the TMP notes that the property was not clear cut when first harvested, and the one subsequent harvest in 1973 focused on thinning of the second growth.

As a result, this 40-acre parcel has the good fortune to still have a robust remnant of 60 "old growth" or virgin redwoods. Old growth redwoods are especially valuable and important today due to their crucial role in providing habitat for many wildlife species, including state and federally endangered and threatened species.

The 2015 TMP (page 4) states that the management goals for harvesting timber include "considering other values (which includes) retaining residual redwood trees with valuable wildlife structure such as large limbs, broken or flattened tops, and large basal cavities." Does "considering other values" mean the forest owner is committed to long-term protection of the residual old growth trees?

The TMP (page 5) also states that "sustainable harvesting will allow for the removal of approximately 92 MBF of second-growth redwood and 93 MBF of Douglas fir every 10 years." Does the omission of "residual redwood" mean that the owner is committed to long-term protection of the residual (old growth) trees?

If this is the case, as we hope it is, CGF requests that the TMP clearly indicate the property owner's long term commitment to protect these increasingly rare and environmentally valuable relics of the original virgin redwood forest in San Mateo County.

CGF also recommends that the Findings, (Attachment A), Resolution (Attachment D) and Ordinance (Attachment E) on this item be amended to: (1) add "from Open Space" before "to Timber Production" and (2) add "from Resource Management (RM)" before "to Timberland Preserve Zone (TPZ)". This would ensure that the General Plan Map Amendment and Zoning Map Amendment descriptions are clear as to the previous designations for this property.

Thank you for consideration of our comments.

Sincerely,

Lennie Roberts

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