

DEPARTMENT OF FORESTRY AND FIRE PROTECTION

604 Antelope Blvd.
Red Bluff, CA 96080
Website: www.fire.ca.gov
(530) 528-5116



December 21, 2006

RECEIVED

DEC 27 2006

TEHAMA COUNTY
PLANNING DEPT.

To: George Robson
Tehama County Planning Department
444 Oak Street
Red Bluff, CA 96080

From: Adam Wyman, Unit Forester, Tehama-Glenn Unit
California Department of Forestry and Fire Protection (CDF)
604 Antelope Boulevard, Red Bluff, CA 96080

Re: Comments on the Tehama County Draft General Plan 2006

Dear George,

I have reviewed portions of the plan reference above. As the Unit Forester here in the Tehama-Glenn Unit, My responsibilities include heading Resource Management programs such as timber harvesting, vegetation management and landowner assistance programs. I also provide environmental review of County Planning documents. As you know, Steve Sherman, Battalion Chief here in our Unit also provides review of County projects and documents.

I appreciate the opportunity to provide written comments on the General Plan. My comments are included below.

P2-6 par.2 North Planning Area. How would croplands in Bend be protected given the existing proximity of housing to small-acreage croplands? Development pressure is likely to target these farming parcels.

P2-6 North Planning Area. BLM has been expanding holdings along the Sacramento River in anticipation of establishing a national recreation area. As yet, there has not been much expansion of public use because public access and amenities have not been established. Some of this land is adjacent to residential development. Assuming that these improvements are in the works, how will the BLM buildout impact communities in Bend, Jelly's Ferry, Surrey Village and Lake California? Trespass, litter, crime, traffic and other neighborhood disturbances may occur without county planning.

P2-7 East Planning Area. This section should include a discussion of commercial and residential parcels east of Morgan Summit along 36E. This area is likely to receive development pressure as Almanor grows.

P2-10. Table 2-3 Community Types. There is no mention of Rancho Tehama as a community.

P2-12. Timber. For the most part, lands owned by industrial timber companies have been zoned TPZ. However, not all timberlands are zoned TPZ by the county. Small residential and commercial parcels that have not been fully converted to non-timber growing use are still defined as timberland by the Public Resources Code. State regulations apply to these lands independent of zoning status. *Timberland* can also be present on a portion of a parcel. Private lands in the transition zone often contain a mix of timberland and non-timberland. These transitional parcels exist in the Manton, Mineral, Paynes Creek and Tehama-Cohasset areas. On the Westside, they are located in the Twin Springs, Colyer Springs and Saddle Camp areas.

The discussion of timber on P2-12 is correct in that TPZ provides protection from conversion to other uses, but that protection is not absolute. Landowners can apply for a conversion permit. Compatible uses can also be approved for a parcel that retains its TPZ status. Non-TPZ timberland, as discussed above, also has limitations.

P2-16 Natural Resource Lands. Par 1. Lands that are not designated as Natural Resource Lands will still have key resource amenities. Land use designations such as timber, agriculture or water also support recreation and critical habitats. These resource benefits may be formally recognized or unrecognized by the land manager/owner.

P2-17 Scenic Easements. Conservation easements are not limited to only Scenic Easements. Conservation easements could be cropland or any other property with resource values. Conservation easements may also not be permanent but may be a temporary status. .

How do conservation easements fit into the NR designation? Conservation easements often retain historic farm or ranch production, but otherwise they inhibit future commercial development. Conservation easements also evolve through time, allowing traditional uses for a period, and then change to a more environmentally protective condition after an event such as the death of the landowner.

P2-18 Non Jurisdictional Public. Add BLM and Fish & Wildlife lands. Particularly along the Sacramento River, these properties add recreational focus and thereby affect adjacent private land use.

P2-29 IM AG-2.1a. "...classified according to *three* general land use categories Upland Agriculture, Valley Floor Agriculture *and Timber*".

P2-30 IM AG-2.1b. "...purpose of this review is to ~~insure~~ *ensure* that agriculture lands.." Delete 2nd "either currently or potentially preserved for agricultural"

Consider adding RCD member to Ag Advisory Commission.

Consider adding **Registered Professional Forester** for issues that address oak-woodland or timberland.

Is the Tehama County Sheepmen's Association still viable?

IM AG-2.1d. How are currently-producing agriculture lands handled that are too small for Williamson Act Lands?

P2-34 Policy LU-5.4. How is "agricultural viability" determined? This determination could be subjective considering that a one-acre strawberry field or organic vegetable garden may be viable but a 10-acre irrigated pasture could be part of a hobby farm.

P4-5 IM PS-2.1a. County shall coordinate with federal land agencies that provide recreation opportunities to the public. The private sector and county typically supplies the support infrastructure for such recreation (in the form of roads, restaurants, motels, sporting supplies).

P5-1 Introduction. Par 3. Add: New resource-based businesses are encouraged by reutilizing traditional timber and agriculture industries. Changing demographic and culture shifts promote ecotourism, slow and organic food, non consumptive recreation, field schools and boutique agriculture products. These are geographically diverse businesses that are based on land use.

P5-2 par.3 Add: Except for urbanized centers, most of the county's landscape retains its agricultural or natural appearance. Natural (ecological) processes dominate the county. They provide an asset that can be exploited (utilized) by business. Publicly owned lands contribute to this natural endowment and they can help support the business economy.

P5-6 IM ED-3.5a Evaluate opportunities for resource-based businesses, both manufacturing and services.

P6-2 Biological Resources. Add a new section: Oak Woodlands. Oak woodland habitat deserves mention since it the most prevalent and representative characteristic of Tehama County. It hosts a wide range of endemic and migrating species and provides the groundwater and watershed for current land use. Although oak-woodland is not critical in the sense of endangered species, its presence deserves being incorporated into county wide land use decisions.

P6-3 par.1 Riparian Habitat. "...and wildlife habitat. *Riparian zones also act as a flood buffer during high water events. All of these* are required for a ..."

P6-4 Historic. Historic land use interpretation and education could be part of an ecotourism industry. (Examples: Visit a "real" farm or ranch; Visit the famous Tuscan Springs resort site.)

P6-12 Goal OS-4 To protect, preserve and enhance fish and wildlife species *by maintaining healthy ecosystems.*

P6-13 par.1 (box) correct typo: "...if these activities **do** not threaten..."

P6-13 IM OS-4.1b DFG consultation within one mile of an endangered species or habit may trigger an excessive amount of review. Some habitats have an extremely wide footprint (as in vernal pools or YLF). As survey work continues to investigate species, R&E sites will become even more commonplace so that most of the county will fall within the one-mile zone. Instead of the one-mile trigger, consultation should be activated when the habitat elements used by the listed species are present in the project area. The project proponent will have to do some investigation with habitat evaluation but the payoff should be a reduction in unnecessary and expensive consultation.

Policy OS-4.2 I don't believe the Natural Diversity Data Base (NDDB) is used to designate zones of critical habitat. It does identify general habitat types that are considered important or rare. The NDDB is used to record the site location of known listed (and candidate) species. The NDDB does not document where surveys have or have not been conducted, nor does it evaluate the accuracy of the survey. Some site records are decades old and may not reflect current presence of the species. Contact the DFG for better details on NDDB.

P6-14 Policy OS-4.5. The draft Implementation Measures are too weak. Weed species are a major problem to agriculture and are a big cost to public agencies. Add OS-4.c: Implement weed

management practices in development plans that address allowable species and maintenance or control of weed species. This effort is especially important for species that are triggered by development which damages the existing natural controls for the weeds. (For instance, some weeds are particularly good at colonizing recently cleared land such as along new roads or stream crossings, or where grazing pressure has been eliminated).

P6-15 IM OS-5.1c Add: Ensure that mining infrastructure such as the roads, pipes and wires used to support the mining site do not adversely impact off-site resources. The infrastructure can be more disruptive than the extraction site itself.

P6-17 IM OS-8.1a. What is the Tehama County Historical Commission? Can its mission and authority handle the consultation services mandated by this measure?

P6-18 par.3 Why is this statement about Timber Harvest Plans located here in the archeology section? The THP functional equivalent does include archeology along with review of biology, geology, CI, etc, but the CEQA compliance is related only to harvesting, not other projects that could be proposed.

P6-17 Missing implementation measure: Where is the grading ordinance that would protect the water, wildlife and cultural resources listed in Policies 1, 4, & 7? Currently, pre-submission road construction can be conducted in anticipation of a future development project. This work is conducted without any public department oversight.

P7-2 IM AG-1.1c "...from interference related to cellular *or communication* tower siting, the County..."

P7-5 IM AG-2.3e. Consider requirements for a project proponent to provide off-site mitigation where significant loss of native oaks are proposed. The measures could include tree planting, restoration of damaged lands in a particular watershed or community.

P7-5 AG-2.4. This item is strongly recommended. This is a great measure. We at CDF have already been approached by developers who seek information and expertise from Resource Management Staff. CDF is willing to assist landowners and developers by providing information on how to protect and care for native oaks before, during and after construction. This item allows for CDF to educate landowners on the importance of oaks. We strongly support this item.

P7-8 IM AG-5.1a. Does the Hardwood Advisory Committee still exist?

P7-9 The RL, HR, UA restrictions adjacent to timberland do not recognize existing residential uses that are present (examples: Manton, Mill Creek and Mineral).

P7-9 Policy AG-6.5. Include a reference to "best management practices (BMP's)" in the Policy.

P7-10 IM AG-6.5b. Note that CDF does not commercially harvest timber in Tehama County, however CDF does regulate those that do. Landowner's (project proponents) intending to harvest timber have the responsibility for noticing landowners within 300 feet of a project (14 CCR 1032.7), and within 1,000 feet if there is downstream domestic water supplies (14 CCR 1032.10). We suggest once a landowner is notified of the intent to harvest timber through the State's timber harvest plan process, a landowner may contact CDF Resource Management Staff to request materials such as; the California Forest Practice Act, Forest Practice Rules, the CDF review process and how to obtain copies of a timber harvest plan.

Under this item, it would be helpful to include the definition of "Timberland" as found in the California Forest Practice Rules under 14 CCR 895.1 and PRC 4526, which states, "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis after consultation with the district committees and others.

Note that non TPZ timberlands also exist. The State has responsibility to minimize non-compatible uses in timberlands along with the efforts of the county. Providing the definition of timberland to landowners would guard against illegal conversions of timberland and also prevent a landowner from attempting to harvest timber without a permit from the State.

IM AG-6.3b. TPZ minimum acreage limit could be reduced by the county to allow small parcels into the tax reduction program. Additional development limitations also are attached to TPZ.

Please accept these comments and consider any revisions to the General Plan as necessary. Again, we are very grateful for the opportunity to provide these comments for your consideration.

Sincerely,



Adam Wyman
Unit Forester, CDF

Cc. Pacific Municipal Consultants (PMC)
Steve Sherman, Battalion Chief, Tehama-Glenn Unit,
Gary Durden, Unit Chief, Tehama-Glenn Unit