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Main Office PO Box 160, Petrolia, CA 95558 Ph: (707) 629-3514 Fax: (707)629-3577 mrc@mattole.org

Mattole Restoration Council

www.mattole.org

Upriver Office PO Box 223, Whitethorn, CA 95589 Ph: (707) 986-1078 Fax: (707) 986-7374 upriver@mattole.org

November 2, 2015

Russell Henly Assistant Secretary of Forest Resources Management California Natural Resources Agency 1416 Ninth Street Suite 1311 Sacramento, CA 95814 <u>AB1492Program.Comments@Resources.ca.gov</u>

Re: Timber Regulation and Forest Restoration Program Draft Concept Paper on Forest Planning Watershed Pilot Projects.

Dear Mr. Henly,

I am writing on behalf of the Mattole Restoration Council. Thank you for this opportunity to comment on the draft concept paper on Forest Planning Watershed Pilot Projects. I participated in the first workshop but want to ensure additional comments.

I will be brief and hope to be informed of future opportunities to comment as the process refines and unfolds.

Because the forests and timberlands across the state cannot possibly be characterized under one template, I suggest a data website that has the ability to be both site specific and overlay state concerns. On this topic I have a few examples that could drive future data gathering as well as inform cumulative impacts analysis and my telescope falls on the Mattole only as an example to inform this process.

Mattole Watershed – Data secured:

-endangered species: botanical, terrestrial, aquatic (casalmon.org is a great reference for salmon counts), NCWAP for the Mattole -impaired listing through Water Board-sediment and temperature -fire frequency and severity (CALFIRE) -geologic mapping, THP history, land ownership, etc (NCWAP up till 2003) -Bureau of Land Management Plans and Analyses: Mill Creek, Honeydew Creek, King Range NCA

Mattole Watershed- Additional data available to update periodically -check the mattole.org website periodically

-Mattole PTEIR cumulative impacts assessment

-Mattole restoration projects (estuary, off channel habitat Headwaters, -Fuel load reduction projects (soon to be uploaded into CAL-MAPPER- it would be great if this information was not only for internal use, but available to public), also MRC annual reports available on website

-Mattole River dissolved oxygen studies, spawner surveys and downstream migrant counts (Mattole Salmon Group)

-Humboldt Redwood Company Watershed Analysis for the Mattole

Data Needs for the Mattole: -forest stand species/density -Fuel loads: species/density -updateable climate change information (we did a report in 2012) -research where geologic prescriptions worked or didn't work

Sensitivities of the Mattole:

Coastal forests exhibit less fire frequency but that means in times of drought that our fuels are THICKER with fuel.

Our geology has been determined to be the most erosive of any watershed (Mattole NCWAP report HRC Mattole Watershed analysis among others) Low water flows in river

In addition, watersheds conditions are rapidly changing due to climate changes, affecting rain/snow-fall timing and severity, fire hazard timing and severity. These two things are critical to keep in mind for any pilot project. So with this lead in to the data needs list, all projects need to think first about forest resilience. What are the current fuels? What type of density? What are the threats? What values most need to be protected (prioritized)? How are roads holding up? What populations/species not already listed are being affected, including what trees are showing drought intolerance and are now a fire hazard? How can we thin strategically for water conservation? Prioritize forest stands at risk for crown fire.

Ask research type questions for pilot project that might ask pilot to experiment with different types of treatments to evaluate and understand BMPs Ensure sensitivities of given place are identified and addressed Ensure EASY process for first few pilot projects so we can get down and learn. Ensure accessible data for public and project proponents — a photo that can be easily uploaded to show improvement, etc Ensure that all agencies can access that same information and REQUIRE integration and communication between agencies. Ensure improvement of habitat with incentives---value habitat rich land more and grant stewards of smaller holding easier access to public funding Ensure improvement in forest resiliency with fuels treatments, including burns Ensure opportunities for multi stakeholder fieldtrips Identify areas most at risk to crown fire. Include prescribed fire as a restoration opportunity. Include ridgeline treatments where historically open to reclaim prairie footprint and then disconnect forest edge by treating vertical and horizontal fuels. Prioritize any dead, dying or diseased stands for treatment (dependant on threat)

Suggestions overall to cause less harm through forestry: Move to a selection type silviculture Broaden stream buffers Ensure retention of all Old Growth Incentivize carbon projects

In closing it is very important to keep focused on the original intent of the bill to include a multi-stakeholder process across multiple fields of disciplines. Include the public, include foresters, timber companies, downstream property owners, wildlife agencies, waterboard, etc. And try real hard to reduce the financial burden of landowners who are proactively improving their forests, streams and grasslands. Thank you for this opportunity to suggest a few comments.

Sincerely,

(fli Freedlin)

Ali Freedlund Working Lands and Human Communities Program Mattole Restoration Council <u>ali@mattole.org</u> (707) 822-4477