

## Frequently Asked Questions: MRC PTEIR

*What is a PTEIR?*

The letters stand for "Program Timberland Environmental Impact Report". The California Board of Forestry established the PTEIR process in the mid-1990s to consider entire programs of timber harvesting as a whole, instead of examining logging units on a plan-by-plan basis. The expected impacts are all examined up front. Subsequently, landowners who want to log under the terms of the PTEIR file PTHPs (Program Timber Harvesting Plans), which are site-specific logging plans tailored to the conditions of the individual stand.

The PTHP includes a checklist to demonstrate whether the intended logging is an implementation of what was envisioned in the PTEIR. In terms of the California Environmental Quality Act (CEQA), this means that the PTHPs are "tiered" to the PTEIR.

*Will clearcuts be allowed under the PTEIR?*

Clearcuts and other forms of even-aged management (such as seed tree or shelterwood) will not be allowed under the PTEIR. The project description includes individual tree and group selection as options, both considered varieties of uneven-aged management. Group selection allows openings of up to 2.5 acres, with trees required to be retained in any opening larger than one acre. In addition, we have designed a special prescription for hardwood-dominated stands in the Mattole known as the all-aged prescription, which will allow a mixture of small group openings (2.5 acres or less) where Douglas-fir would be planted, along with thinning in the rest of the stand.

*Will all logging in the Mattole have to follow the PTEIR rules?*

No. Landowners who prefer will still be able to file traditional THPs, Non-industrial Timber Management Plans (NTMPs) or any of the exemptions that they can currently use. The PTEIR is an option that landowners can select voluntarily.

*Besides individual and group selection, what kinds of silviculture would be allowed under the PTEIR?*

Commercial thinning is the other standard prescription from the Forest Practice Rules that would be included in the PTEIR. Like individual and group selection, it requires that a well-stocked stand of trees remain after harvest. In addition, our foresters have drafted a new prescription tailored to help landowners shift the composition of their forests away from the hardwoods that took over many sites after logging in the 1950s and '60s which preceded the state replanting requirement. It's called "all-aged management," and will allow small groups of trees (no more than 2.5 acres, with trees retained in any patches larger than half an acre) to be cut, and for leave trees and planted seedlings to both be counted toward the restocking of the land.

*Will old-growth trees and forests be protected under the PTEIR?*

Yes. All trees that pre-date 1850 will have to be left standing, provided they meet certain minimum diameter requirements: 42 inches for redwood, 40 inches for Douglas-fir and grand fir, and 32 inches for hardwoods. In addition, late-seral habitats, even if they are in stands more recent than 1850, will be managed to maintain or enhance the late seral nature of the stand during any PTEIR logging. Policies in the project also require landowners to preserve wildlife trees and snags, and encourage the designation of legacy trees.

*How will streams be protected under the PTEIR?*

Stream protection under the PTEIR is stricter than the Forest Practices Rules, even after the 2009 adoption of the Anadromous Salmonid rules. There are larger "no-harvest" areas around streams (including a complete no-harvest buffer of 75 feet on either side of fish-bearing streams, and a 30-foot buffer on either side of Class II streams, which support aquatic life but not fish), reduced allowances for road construction, higher standards for stream crossings, and stricter limitations on operating on steep slopes.

Perhaps most importantly, the PTEIR includes several policies to steer logging away from unstable slopes -- the best way, we have concluded, to avoid triggering landslides or other "mass-wasting" events that are responsible for the bulk of sediment entering Mattole streams.

*Are winter operations allowed?*

Under the PTEIR ground-based yarding, road construction or reconstruction, and road rocking would not be allowed from November 15 to April 1, regardless of rainfall. Log hauling on permanent, rocked roads would be allowed so long as it did not cause a measurable increase in turbidity downstream. Also, the PTEIR prohibits timber harvest activities during "measurable rain events", which are defined as more than 1/4 inch of rain in a 24 hour period. Land owners would still be able to do some fuel treatments, such as hand piling and burning, hand fire line construction, or other activities which do not involve the use of heavy equipment or timber hauling.

*How about herbicides?*

No synthetic herbicides may be used to control native vegetation (such as tanoak) on any active plan under this PTEIR.

*Why is the Mattole Forest Futures Project a particularly good idea now?*

Over the last two decades, a changing regulatory climate has greatly increased the cost of securing timber harvest permits in California. Non-industrial forestland owners who prefer to log with a lighter touch have been particularly hard-hit by these changes. The cost of permitting has made light harvests less feasible, creating economic pressures to either subdivide large land

holdings, log more intensively than landowners would prefer, or leave the forest unmanaged, thereby allowing a hazardous build-up of fuels.

We want landowners to be able, through light-touch timber harvest, to accelerate the return of previously logged forests to ecological maturity, to have the means to upgrade their roads so they are not dumping sediment into the river, and to have an incentive to retain their lands instead of subdividing them. Further, we hope light-touch logging will make possible a modest, sustainable harvest of timber that could support a moderate level of forest-based livelihoods in the Mattole.

*Where did the MRC get the idea for the Mattole Forest Futures Project?*

The Mattole Forest Futures Project -- to be implemented through the PTEIR -- was conceived at the California Forest Futures conference in Sacramento in 2005, the brainchild of then-MRC executive director Chris Larson, along with Richard Gienger (involved for many years in restoration and the reform of forestry regulation in the Mattole and nearby areas) and Sally French (Mattole timberland owner, and member of the board of Forest Landowners of California).

The project grew out of the recognition that the high cost of a THP increases the pressure to harvest more than would be ecologically beneficial, and that THPs focus their environmental analysis tightly on a single harvest, missing the effects on the broader landscape. At the same time, with second-growth timber across the Mattole beginning to reach harvestable age, the pace of logging is apt to pick up soon, making these issues more pressing than they have been in recent years.

*Why is the MRC involved in a commercial logging project?*

As described here, the logging that will occur under the PTEIR will actually benefit the recovery of the watershed. In a forest whose structure was altered so substantially by all-at-once logging half a century ago, judicious logging can promote the return of old-growth habitat, and protect the continued recovery of streams that provide habitat for salmon, steelhead, and other aquatic life.

But even beyond those aims, we see sustainable logging as right livelihood that makes honorable use of the gifts that Mattole land has to offer. Since the founding of the MRC in 1983, sustainable harvest has been part of our vision of learning what it takes to live in this watershed for the long term.

Our mission statement lays out our aim of "the restoration of natural systems in the Mattole River watershed and their maintenance at sustainable levels of health and productivity, especially in regards to forests, fisheries, soils, and other native plant and animal communities," and directs us to pursue this goal by (among other ways):

Pursuing the education and involvement of watershed residents and landholders in ... sustainable harvest techniques;

Conducting research and encouraging the development of land-use techniques and cultural and economic activities which further the sustained productivity of the resources base in the Mattole watershed;

Encouraging the development of regional and watershed-based self-reliance through creative, productive and interdependent human relationships with the Mattole watershed.

These aims have been part of the MRC's mission statement since its incorporation in 1985.

*Who decides what is in the PTEIR?*

The MRC is responsible for the content and submission of the approved PTEIR . The MRC hired Baldwin, Blomstrom, Wilkinson and Associates, a forestry firm in Arcata, to write the PTEIR under the direction of MRC staff, with the advice of the Mattole Forest Futures Steering Committee.

The PTEIR is an analysis of the likely effects of the Mattole Forest Futures Project. The project description -- the specific forestry practices that could be followed under the PTEIR permit -- was devised in consultation with a broad-based steering committee made up of 9 members -- including two foresters, two Mattole landowners, and members of local environmental and forestry groups -- who represent a variety of viewpoints on land use in the Mattole.

The project description is the document available here (or here, in abbreviated form).

CAL FIRE is the "lead agency" for this project and approved the document in September 2011.

*Did the public provide input on the project?*

Yes. Neighborhood meetings were held from April to June 2007 in 4 places in the Mattole, with outreach conducted through KMUD, the Independent, posters, and mailed notices. About 50 people attended these meetings. In January 2008, the project's Notice of Preparation, a required document informing the public that the plan would be written, was filed, inviting official scoping comments. A scoping meeting was held February 11, 2008 at the Mattole Grange Hall between Petrolia and Honeydew. Representatives of the Calif. Dept. of Forestry and Fire Protection (CalFire) were there, along with the Council and its forestry consultants, BBW Associates of Arcata. In addition, six scoping comments were received by CalFire.

After the scoping process, we met with people who had concerns about the project to take their comments into account as we wrote a final project description. In addition, we drew on the expertise of the Mattole watershed's Technical Advisory Committee, which includes scientists from federal and state agencies. In July 2010, we held two public meetings, in Ettersburg and Petrolia, to describe the project we had in mind, and heard remaining concerns from Mattole residents and landowners. Once submitted, there was a final public comment through Cal-Fire that was open for 60 days.