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From: **Jene McCCorey** <jlmwesaw@yahoo.com>

Date: Mon, Apr 22, 2013 at 8:20 PM

Subject: MRC PTEIR HCP ITP NCCP – Request to extend public comment p

To: mrc.hcpitp@noaa.gov

Please extend the public comment period for the proposed issuance of and inc Mendocino Redwood Company under the federal Endangered Species Act (E: Species Act (CESA). Significant new information and changed circumstances: comment period require an extension of public comment to fully implement th Environmental Policy Act (NEPA) and the California Environmental Quality information also requires that the document be re-circulated under the provisio

Reasons to extend the public comment period: (1) California Fish and Game (considering whether to list the Northern Spotted Owl as a threatened or endan ESA. On April 17, 2013, the Commission voted to delay its decision on whet 90 days. (2) Upon accepting the petition, the Northern Spotted Owl will be li full protections under CESA during the pendency of the status review.

The proposed ITP for the Mendocino Redwood Company involves a significa Spotted Owls over several decades. The impending new protections under CE environmental documentation. (2) NEPA requires that any threatened violatic DISCLOSED AND ANALYZED. Presently, the environmental documentati proposed does not disclose or analyze this significant new information.

Therefore, officials SHOULD COMPLY WITH NEPA and extend the public days. This would allow the CA Fish & Game Commission to be more fully i decision from your agencies.

Furthermore, given that the development of the proposed incidental take per much of which occurred behind closed doors in private negotiations between

it is extremely prejudicial to allow so little time for the general public to review the extensive documentation. Another 90 days of public review would only strengthen the analysis and would not in any way prejudice the permit applicant.

PLEASE DO NOT ISSUE AN INCIDENTAL TAKE PERMIT THAT LAST LONGER THAN 10 YEARS! (1) The proposed 80 year permit is completely unsupported by the best available science (2) and the past **FAILED PERFORMANCE** of similar permits issued to timber companies in northern California. (3) The mitigations proposed are inadequate to ensure that the affected species will recover from the brink of extinction. (4)The action fails to account for the recovery goal for Marbled Murrelets because it fails to protect all suitable habitat and create new habitat. Instead, the permit relies heavily on a single large reserve area for murrelets, in clear defiance of **SCIENTIFIC EVIDENCE POINT TO THE NEED FOR MORE HABITAT TO RECOVER THIS SPECIES** on the Mendocino Coast.

These failures and the lack of sufficient aquatic protections is a glaring deficiency. The National Marine Fisheries Service's interim guidelines for Habitat Conservation Plans should be utilized as a starting point and **NEW RESEARCH/scientific publications** regarding water quality, temperature and flow as they **RELATE TO THE CUMULATIVE IMPACTS** of timber harvesting **MUST BE INCORPORATED** into the analysis.

Furthermore, the timber company is committed to continued use of **PESTICIDES** across large swaths of habitat for imperiled species. This **IMPACT MUST BE FURTHER ANALYZED** by the Services and water quality specialists. At present, **NO MONITORING** of pesticide contamination **IS PERFORMED** on any timberlands or adjacent public and private lands.

In conclusion, the proposed action is for a take permit that would be in place for decades, so another 90 days of public review would only benefit the public interest. Please increase protections for endangered species and watersheds regardless of action on additional public comment.

Sincerely,

Jene McCorey
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