

April 21, 2013

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Re: MRC 80 year HCP / NCCP / TMP

Gentlemen:

I am submitting comments on behalf of the Mendocino Organic Network and the Cooperrider Family.

I agree with the comments submitted by Kathy Bailey (Letter of April 7, 2013) that the MRC HCP is “another step on the road of an evolving attempt to come to grips with how to manage a vast privately-owned landscape with both highly significant public trust resource values and huge economic value”. However, considering the huge economic value—once again, the scales seem to be tipped in favor of those seeking to cash in on the economic value while shortchanging the public trust resources such as wildlife and clean water.

I will cite a few examples of where the plan is flawed. Given the controversial nature of the use of pesticides in the county and the well documented examples from all around the world of the unexpected and unforeseen consequences of pesticides on wildlife (and humans), and given the tendency of MRC (and other timberland owners) to have blind trust in the manufacturers of pesticides, we find it amazing that “the application of pesticides...is not a covered activity” in the HCP. This leaves MRC with the freedom to use whatever new pesticide is coming on the market, and as we can see from the history of pesticide use in this country, the regulators are not able to keep up with the well-heeled, well-lobbied manufacturers of these poisons. This plan is supposed to provide protection for 8 animal species and 31 plant species. Can we really assume that none of these species are going to be impacted by the current and future pesticide use of MRC in combination with the stress that their activities are already placing on these fragile resources?

The HCP/NCCP should spell out in detail MRC’s plans for pesticide use and analyze the impact of such use on the species it purports to protect.

A second and serious flaw in the HCP/NCCP is the superficial treatment of global climate change and the implications for forest and land management. While the overall global trend of climate change—higher temperature, more extreme events (flooding, hurricanes, fires, etc.) is well known, it is safe to say that there is a great deal of uncertainty about the future—especially for a specific locality such as Mendocino

County. Given this uncertainty, MRC's devotion to converting hardwoods to conifers (for short term economic gain) seems quite short sighted (some would say stupid). Wouldn't it be better to have an established stable plant community on a site under such conditions? The history of natural resources management is filled with examples of how "managers" attempted to replace one plant community (or one "keystone species of wildlife") with another—only to find that there were unexpected, unintended, and unforeseen consequences. In some cases the result was that neither plant community (the one being eradicated or the one desired) survived. The case with animals is the same.

Given these examples of shortcomings, and I am sure there are many others, I heartily agree with Kathy Bailey's comments regarding the time horizon for this plan. She suggests that MRC "continue to plan to a theoretical 80 year horizon, but provide for periodic" (I would suggest 10 year) "reopeners to evaluate the accuracy of the assumptions made, assess the changing landscape, and determine the adequacy of the conservation plan as proposed for each covered species and for sustained yield."

Sincerely,

Els Cooperrider
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