

April 22, 2013

To: Eric Shott

National Marine Fisheries Service email mrc.hcpitp@noaa.gov

Chris Browder Cal Fire Resource Management email sacrametopubliccomment@fire.ca.gov

From: Mendocino Environmental Center 106 W. Standley Ukiah Calif. 95482

Re: MRC HCP ITP and PTEIR

Mendocino Environmental Center Public comment :

We have reviewed the MRC documents referenced above. In the last 2 days we have been able to access other public comments on the Cal Fire website that is displaying today April 22, 2013. We have reviewed the following public comments on the Cal Fire website and are in complete agreement with the questions raised and the comment made.

1. Willits Environmental Center letter of April 17, 2013
2. Coast Action Group letter of April 13, 2013
3. Paul V. Carroll letter of April 3, 2013
4. Darcie Mahoney letter of April 11, 2013
5. Sierra Club letter of April 17, 2013 by Mary Walsh
6. Kathy Bailey letter of April 7, 2013

The Paul V. Carroll letter of 4-3-2013 asks for the Reconvene the Mandated Science Panel as required by the Fish and Game code. We agree with Mr. Carroll that the law must be followed and additionally a 90 day minimum of additional public comment is required to meet the intent of fish and game code and the intent of public comment.

The public is not aware of the issue of herbicides in our forests or of MRC's plan to continue to use herbicide for the next 80 years. Two public workshops are not enough opportunity for the public to be made aware of the issues involved. Because the public was not aware of the plans of MRC for this large forest a local group Occupy Ukiah organized a public forum that was held March 10, 2013 at Ukiah Methodist Church with the purpose of discussing MRC's plans to continue herbicide use. This event had a panel where Sarah Billig and Mark Ramaully of Mendocino Redwood Company spoke. This was video-taped by Mendocino Access Television and now plays on Channel 3 TV here is Ukiah. This two panel and public discussion was mostly about MRC and their plans. We ask this be entered into the public record.

It is unfortunate that comments from the public such as the six letters above were not available at that time for public review. Please view the March 10, 2013 video put on by the common people. We need more of this. The people used their own money and resources to try to get the word out about the extensive use of herbicides in the forest by MRC. We are requesting more time to involve the public in this 80 year plan. Additionally public comment received was not posted on website in a timely manner to allow public to review it (see Sierra Club letter Mary Walsh 4-17-2013).

Mendocino Environmental Center finds it very difficult to believe that broad spectrum herbicides can be sprayed continuously over all of MRC forests over decades without harming the 8 animals and 31 plants protected by law. The effect of the herbicide on the soil alone will diminish the animal and plant life as they depend on the soil organisms to survive.

We are dismayed and astounded that no government agency actually regulates herbicides in the forest. On page 3-456 of the eis/pteir of Mrc lines 35-37 "The use of herbicides is not an activity covered by the USFWS, NMFS or CDFG." The public is unaware there is not oversight of these herbicides. We ask who does protect endangered species from herbicides if the above agencies are not responsible?

If the EPA is responsible for protecting the endangered species where are their inspectors? Where are the testing plans and facilities? Where is the analysis of the cumulative effect of herbicide use in forests, vineyard, homes, parks, and school on our watersheds and water supplies?

Mendocino Environmental Center finds the current and proposed use of herbicides to be a direct assault on our persons since we and our children suffer the health consequences of herbicide use. Additionally our whole ecological system is assaulted by these chemical and all the plants and animals suffer.

We find our government has not protected us from these chemical assaults . We ask USFWS, NMFS and CDFG what government directives removed their agencies from herbicide regulation in regards to the Endangered Species Act?

The Mendocino Environmental Center asserts our rights to life and liberty are being assaulted by Mendocino Redwood Company use of herbicides. According to Mendocino Redwood Company (see March 10 Herbicide panel video) they use herbicides to return the forest to its "natural balance" and for economic (profit) reasons. Using herbicides to restore the "natural balance" makes no sense and poisoning people, plant, animals, soil and water for profit is immoral and illegal when it hurts others.

Mendocino Environmental Center

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