

The article below "*MRC Hack & Squirt Continues Unabated*" was published in the Anderson Valley Advertiser by Will Parrish on September 30, 2015

Mendocino Redwood Company found a number of comments and errors that would benefit from additional correction, clarification or commentary which are presented on the right side of the page in green italics.

Substantial factual information on Mendocino and Humboldt Redwood forests and its practices are available at www.mrc.com. Wherever possible we have provided direct links to specific material on our website to help the readers have easy access.

Text of Article <i>Text of article begins below, spaces placed to allow facts to line up with text of article.</i>	Facts about Mendocino Redwood Company
[BEGINNING OF ARTICLE BELOW]	<p>Mendocino Redwood Company (MRC) was created in 1998 from lands purchased in Mendocino and Sonoma counties with the publicly declared mission to be good stewards of the forest and at the same time run a successful business. We have made significant progress in that regard:</p> <ol style="list-style-type: none"><li data-bbox="858 891 1429 954">1. Adopting policies to make MRCs forestlands FSC certified (since November 2000);<li data-bbox="858 973 1429 1079">2. <u>Adding more than 1 billion board feet of redwood and Douglas fir trees by lowering the rate of harvest;</u><li data-bbox="858 1096 1429 1260">3. Defining of old growth down to the level of an individual tree, along with implementation of a policy to protect all individual old growth trees across our property;<li data-bbox="858 1277 1429 1343">4. Elimination of traditional clear cutting from our property;<li data-bbox="858 1360 1429 1562">5. Long term investments to improve habitat for fish across the property by controlling or holding back more than 1 million cubic yards of sediment (more than 100,000 dump trucks of dirt) from the coastal streams flowing through our forest;<li data-bbox="858 1579 1429 1672">6. Removal of more than 36 long time fish barriers, increasing fish bearing streams by more than 20 miles.<li data-bbox="858 1689 1429 1837">7. Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;
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<p>California timberland owners sprayed 359,147 pounds of pesticides and herbicides on unwanted trees and shrubs in a recent four-year period — 2005 to 2008 — according to data compiled from the California Department of Pesticide Regulation by Cal Fire. A single region of the state — the Klamath/North Coast, including everywhere from Guerneville to Yreka — alone accounted for 256,401 of those pounds, or roughly two-thirds of the state total.</p> <p>The disproportionate use of toxic chemicals within the state's northern coastal forests is unsurprising given that this region's main historic role vis-a-vis the California's political economy is to turn trees into board-feet of lumber, thereby furnishing employment for labor and investment for capital.</p> <p>[ARTICLE CONTINUES BELOW]</p>	<p><i>8. Completing a substantial rebuild of our Ukiah sawmill, assuring that Mendocino County will have infrastructure in the processing of wood products for many years to come; and</i></p> <p><i>9. Employing about 300 skilled employees in Mendocino County earning family-level wages and benefits.</i></p> <p><i>From our inception we have encouraged transparency and we have a publicly stated policy of taking anyone to anywhere on the property to see our practices first hand. Additionally, we post our inventory and other forest facts on our website. You can find more information at www.mrc.com</i></p> <p><i>The data covers a time period up to a decade ago covering the entire state of California. MRC owns forests in Mendocino and Sonoma county. The data commingles pesticides and herbicides. MRC avoids the use of pesticides.</i></p> <p><i>MRC uses herbicides to treat previous owners' legacies on the ground which resulted, among other things, in tan oak unnaturally dominating the forest. The treatment of tan oak will return the forest to a mixed Redwood conifer forest in a time that matters to people alive today. MRC timber harvesting has been and remains much lower than the rate of growth of the forest.</i></p>
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Apropos of the latter, San Francisco's Fisher family alone has invested roughly \$1 billion of their vast riches in their conjoined Mendocino and Humboldt county timber firms, which cover 440,000 acres and employ hundreds of people.

The Fishers' Mendocino Redwood Company, which has faced renewed criticism for its herbicide use this year, accounted for 16,370 pounds during the period Cal Fire studied, or 6.4% of the total used in the North Coast/Klamath area.

Mendocino County denizens' persistent criticism of MRC's Hack 'n' Squirt technique of removing tan oaks and other hardwoods hasn't noticeably slowed down their use of herbicides this year, according to the latest data Mike Kalantarian has compiled from the Mendocino County Agriculture Department. MRC has used 1,299 gallons of herbicides on 3,267 acres as of September 24, according to Kalantarian. MRC has used more triclopyr (garlon) this year than any in recent history: 418 gallons spanning 1,025 acres.

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MRC owns 228,000 acres. Humboldt Redwood Company (HRC) was created in 2008. HRC is a sister company to MRC with the same stated mission to be good stewards of the forest and at the same time run a successful business. HRC owns 209,000 acres. Employing about 500 skilled employees in Mendocino and Humboldt County earning family-level wages and benefits. Forest management decisions occur locally by Registered Professional Foresters, biologists, geologists, botanists aligned with our publicly declared mission to be good stewards of the forest and at the same time run a successful business.

The data covers a time period up to a decade ago covering a large region of California. MRC owns forests in Mendocino and Sonoma county. The data commingles pesticides and herbicides. MRC avoids the use of pesticides.

The time period for the data presented excluded. MRC owns forests in Mendocino and Sonoma county. The data commingles time periods, sources and chemicals.

A few weeks ago, I obtained a copy from a North Coast Regional Water Quality Control Board (NCRWQCB) staff member of MRC's voluntary Imazapyr monitoring data from 2001 to 2014. In 178 water samples, MRC has actually detected the chemical six times. As the NCRWQCB staffer stressed, MRC undertook the monitoring program voluntarily. He says the company's willingness to undertake the testing is representative of how "they are generally pretty collaborative with us."

With respect to the largest portion of Mendo's population that lives downstream from MRC's herbicided lands, some of the detection levels are high enough to raise concern, even if they are far lower than the levels the Environmental Protection Agency considers unsafe for Glyphosate (a somewhat comparable chemical). They include two detections greater than 20 parts per billion.

According to Linda Perkins of the Albion/Little River Watershed Protection Committee, it's the fact that MRC detected the herbicide at all despite its "needle in a haystack approach to testing that's the real story here."

Published research on Imazapyr — the chemical MRC mainly relies on for killing unwanted tan oaks and other hardwood trees — says it binds to sediment particles, meaning that it can disperse downstream following rainfall, which transports said sediment — especially if the sediment in question is on a hillside recently cleared of anchoring vegetation. MRC has previously maintained that it has carried out testing of watercourses adjacent to these "vegetation management" areas and never detected any significant levels of Imazapyr.

From their perspective, that's entirely true.

MRC is regulated by seven (7) state and federal agencies. We voluntarily monitor some other activities on our forest.

Because MRC is heavily regulated, by seven (7) state and federal agencies, we work with regulatory staff constantly and professionally.

The voluntary reporting to the North Coast Regional Water Quality Control Board referenced above related to the chemical Imazapyr.

MRC testing follows well established protocols for safety and accuracy.

MRC uses herbicides to treat, among other things, tan oak unnaturally dominating the forest. The treatment of tan oak will return the forest to a mixed Redwood and conifer forest in a time that matters to people alive today.

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Most likely, not every Regional Water Board staffer would agree with the idea that MRC is “generally pretty collaborative.” The company reportedly has filed three complaints against the license of one Water Board staff member, Adona White, the regulatory agency's point person for designing a program to bring timber companies operating in Humboldt County's Elk River watershed into compliance with the US Clean Water Act's requirements concerning sediment pollution. White and her staff determined that sediment pollution in the Elk River needs to be reduced by 97% in the next 20 years to recover the river's “beneficial uses.” Humboldt Redwood Company owns roughly three-quarters of the upper Elk River's landmass and has intensively logging the area since purchasing the land after its previous owner, Maxxam, went bankrupt in 2008. Virtually ever year, Elk River residents downstream of HRC experience catastrophic flooding, with many often forced to evacuate their homes.

In response to an article I published in the *East Bay Express* and AVA earlier this year, an anonymous MRC spokesperson said that “Humboldt Redwood had a recent difference of scientific opinion with the North Coast Regional Water Quality Control Board and remains in dialogue with the agency about the best way to address downstream flooding issues.”

MRC and our sister company HRC are unaware of any formal complaints filed by our companies against any North Coast Regional Water Quality Control Board staff or a challenge “against the license” of the staff person mentioned in the article. Because MRC is heavily regulated, by seven (7) state and federal agencies, we work with regulatory staff constantly and professionally.

Our sister company, HRC, has been working openly and collaboratively on the Elk River issues with neighbors, regulators, other land owners and other interested parties since we inherited the challenge through the bankruptcy of Pacific Lumber Company in August 2008. We continue to fund and maintain a drinking water system and perform work to improve the watershed. We publish enormous amount of information on all activities on our forests. You can find more information about our sister company and Elk River at hrcllc.com

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We are working hard to restore the forest we own and set an example for other forest owners, managers and regulators to be good stewards of

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MRC is certified as a “sustainable” timber company by the Forest Stewardship Council (FSC), which is roughly the timber industry equivalent to an organic agriculture certification. Unlike the organic food label, though, the FSC places few restrictions on the use of toxic chemicals. The FSC is only a standard-setting organization, though, meaning its personnel do not actually conduct the certification reviews — rather, it farms out that function to other organizations.

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1. *Adopting policies to make MRCs forestlands FSC certified (since November 2000);*
2. *Adding more than 1 billion board feet of redwood and Douglas fir trees by lowering the rate of harvest;*
3. *Defining of old growth down to the level of an individual tree, along with implementation of a policy to protect all individual old growth trees across our property;*
4. *Elimination of traditional clear cutting from our property;*
5. *Long term investments to improve habitat for fish across the property by controlling or holding back more than 1 million cubic yards of sediment (more than 100,000 dump trucks of dirt) from the coastal streams flowing through our forest;*
6. *Removal of more than 36 long time fish barriers, increasing fish bearing streams by more than 20 miles.*
7. *Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;*
8. *Completing a substantial rebuild of our Ukiah sawmill, assuring that Mendocino County will have infrastructure in the processing of wood products for many years to come; and*
9. *Employing about 300 skilled employees in Mendocino County earning family-level wages and benefits.*

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The organization that audits MRC on the FSC's behalf, New York City-based Rainforest Alliance (RA), is currently in the midst of their every-five-years certification audit of MRC. The man on the job is a Dr. Steve Grado, a Missouri State University professor of forestry who says this certification marks the 88th he has conducted for RA. Dr. Grado presided over a lively public meeting in Caspar last month, where an at times unruly rabble persistently challenged the integrity of MRC, the RA certification process, and Grado himself.

An FSC re-certification of HRC took place last year, conducted by a different auditing organization: Scientific Certification Systems (SCS) of Emeryville. Although Elk River residents downstream of the companies logging operation who have been flooded out of their homes spoke out at the same sort of public meeting, which took place in Eureka, the SCS audit team's report neglected to fault HRC in connection with the flooding.

In Rainforest Alliance's 2013 annual report, Mendocino Redwood Company and Humboldt Redwood Company are listed separately as donors to the organization, each in the "\$5,000-\$99,999" category. One of the largest donors to the organization (\$1 million or greater) is the Multilateral Investment Fund, a division of IDB Group: one of Israel's largest banks. Another bancorporation, the Inter-American Development Bank ("the main source of multilateral financing in Latin America,"

Steve Grado is a professor at Mississippi State University.

Stakeholders have the opportunity to provide feedback to the independent FSC auditors. The "town hall" style meetings are held with a facilitator like Dr. Grado. MRC employees are absent in order to allow for the most candid comments.

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MRC and our sister company HRC support Forest Stewardship Council as the preeminent standard for certification of sustainable forest management.

according to the company's web site), has also donated over \$1 million. Two of the other largest donors are agencies of the United Nations.

In the meantime, local residents are collecting signatures for a 2016 ballot initiative that would declare standing dead trees a public nuisance on account of the fire danger it engenders. The idea is to compel MRC to abandon its practice of girdling trees, spraying them with Imazapyr, and leaving them standing dead.

Back in the 1970s, Louisiana Pacific — MRC's predecessor on its 227,000 acres of Mendo timberland — would send helicopters out to spray its freshly-logged hills with herbicides to prevent non-commercial re-vegetation. LP's chemical of choice was chemically similar to Agent Orange, a potent defoliant and teratogen used widely in the Vietnam War.

Alarmed by the initial aerial spraying on LP land near Branscomb, locals mobilized and put a ban on aerial spraying before the Board of Supervisors. The Supes voted them down. So, they mobilized and got an initiative passed by popular vote. Bill Pauli of the Mendocino County Farm Bureau — who, to this day, blithely commands his workers to douse his hundreds of acres of grapevines in Potter Valley, Redwood Valley, and the Ukiah Valley with a whole suite of toxics — sued to block the ban. But the California Supreme Court upheld the

The Mendocino County Board of Supervisors created and funded a working group to study the standing dead tree question. The group is preparing a scoping plan. Additional review of the treatment of tan oak across the county on public and private land will occur in the update of the Mendocino County Fire Safe Plan which is under way. We encourage all interested parties to get involved in the conversation rather than impose more rules and regulations. Tan oak is treated across Mendocino County by forest landowners both private and public.

We treat tan oak, selectively, by hand, carefully, in the woods, literally tree by tree, by notching the trunk and injecting a few milliliters of herbicide directly to the trunk.

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Within months, state Democrats, including those elected from this area, led by Willie Brown, their coffers stuffed with corporate ag cash, passed legislation that decreed that individual counties could not regulate herbicides and pesticides. Only the state could decide on the big ticket stuff like who can spray deadly chemicals and who can't.

And that, in short, is the story of why Mendocino County does not have jurisdiction to ban Hack and Squirt, but is instead limited to declaring standing dead trees a public nuisance.

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directly to the trunk.

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