A Letter to the Editor, titled "Time to Change Forest Practices" by Tom Fristoe, Willits, was published in the Ukiah Daily Journal on April 20, 2016.

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

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	Facts about Mendocino Redwood Company
Text of article begins below, spaces placed to	,
allow facts to line up with text of article.	
[BEGINNING OF ARTICLE BELOW]	Mendocino Redwood Company (MRC) was created in 1998 from lands purchased in Mendocino and Sonoma county 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:
	 Adopting policies to make MRCs forestlands FSC certified (since November 2000);
	 Adding more than 1 billion board feet of redwood and Douglas fir trees by lowering the rate of harvest;
	 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;
	 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;
	 Removal of more than 36 long time fish barriers, increasing fish bearing streams by more than 20 miles.
	 Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;

[BEGINNING OF ARTICLE]

Time to change forest practices

To the Editor:

Back in 1998, the Fisher family, billionaire owners of Gap and Banana Republic stores, bought 235,000 acres of heavily logged Mendocino and Sonoma County "timberland" from Louisiana Pacific, making them the largest private landowners in Mendocino County. Despite heavily publicized promises to log responsibly and sustainably, Mendocino Redwood Company (MRC) and their Humboldt division (HRC), continued clear cutting at pretty much the same destructive rate as LP had been doing, four to six percent of standing inventory per year.

This is well over twice the maximum rate recommended by the late Dr. Hans Burkhardt, author of Maximizing Forest Productivity, and member of the Mendocino County Forestry Advisory Committee. Dr. Burkhardt said a rate of no more than one to two percent was necessary in order to have sustainable timber production — and he had decades of research data to back it up.

MRC and HRC also continued the questionable practice of poisoning non-commercial varieties such as tan oaks and leaving swathes of standing, dead trees in the forest. This is generally done through a process called hack-

- 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
- Employing about 300 skilled employees in Mendocino County earning family-level wages and benefits.

MRC was created in 1998 from lands purchased in Mendocino and Sonoma county with the publicly declared mission to be good stewards of the forest and at the same time run a successful business. This set a different, sustainable and better path from the legacy of previous owners. In addition to the California Forest Practice Rules, MRC voluntarily subjects itself to third party verification of forest practices under the guidelines of the Forest Stewardship Council (FSC) and has done so since 2000.

With the purchase of LP lands in 1998, MRC ended the use of clearcutting and reduced the harvest rate to below 2.3% of standing inventory (see our website for detailed harvest rates at http://www.hrcllc.com/key-policies/landscape-planning/.

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and-squirt, where they hack through the inner bark every few inches around the trunk of the tree and squirt in poison. LP used to use Garlon. MRC has transitioned to imazapyr, which may be marginally less toxic to aquatic life. Whatever the toxicity level, the most crucial problem with poisoning trees and leaving them is increased fire danger.

legacy of previous owners. This legacy includes tens of thousands of acres of redwood and Douglas fir forest that are now dominated by tanoak. MRC is committed to restoring these forestlands to the natural balance of conifer and hardwood.

Beginning in 1998, when MRC was established, we spent several years on a variety of methods to treat tan oaks (including an ill-fated and expensive effort to make tan oak flooring). After much effort, we concluded the most effective way to bring back a healthy conifer forest in our lifetime was to treat tan oak, selectively, carefully, in the woods, literally tree by tree.

Treating tan oak involves using herbicide (about two cups per acre) that is injected directly into the trunk of tan oak trees, following a cut made in the bark. The treatment results in trees dropping most leaves in six to nine months (depending on the time of year), and beginning to fall down within three to four years. After several years, the treated trees largely decompose and their biomass is added to the duff layer of the forest. The treatment of tan oak reduces competition for sunlight and water allowing redwood and Douglas fir trees to thrive.

Treating tan oak encourages the emergence of a healthier forest by restoring the health of redwood and Douglas fir trees.

Since the inception of MRC, approximately 65,000 acres have been restored to a natural conifer balance by controlling tanoak and planting 8.8 million redwood and Douglas fir seedlings.

The treatment of tanoak to restore the natural balance of conifer to hardwood is a tool used for at least 25 years. Small private landowners, industrial landowners, and state landowners all use this tool to achieve this goal in a careful and controlled manner according to state regulations.

Fires can cost millions of dollars – so you have to wonder why the county allows a practice that can potentially bankrupt us. Last summer's fire season was exceptionally bad. We had fires both north and south of us and Mendocino County lay

under a pall of acrid smoke for weeks at a time. Huge portions of neighboring Lake County were devastated, making 3,000 Lake County residents homeless. The Valley Fire burned more than 76,000 acres. It destroyed 1,280 single-family residences and 27 multifamily buildings. It left behind mountains of toxic ash, which endangered health and slowed the rebuilding process. Ten percent of businesses in Lake County were either damaged or destroyed. All in all, the fire cost hundreds of millions of dollars. And this was after the Rocky and Jerusalem fires, to the north and east of the Valley Fire, had already incinerated nearly 100,000 acres in late July and August. Forestland Steward – a joint project of CAL FIRE, the USDA Forest Service, and others, to provide information on the stewardship of private forestlands in California put out a Summer 2015 edition of Forestland Steward News, titled "Fire Behavior: What's Going On? " In that issue they blame both drought and increased fuel load for the fact that wildfires are burning more intensively, more frequently, and over larger areas. There's not much we can do about the drought. The increased fuel load, on the other hand, is partially caused by man and partly by nature, the result of a hundred years of fire suppression, as well as the result of trees killed by disease and insects.

CalFire, the Lead Agency on forest regulations, independently reviews and verifies all Timber Harvest Plans (THPs). THPs are considered a California Environmental Quality Act (CEQA)-equivalent Environmental Review Document. Among many things, CalFire reviews THPs for fire safety and requires mitigations where appropriate.

It is common knowledge contemporary forest management can be used as a tool to thin forests, bringing them back to the natural, fire resistant forests they once were. MRC's policy of selectively harvesting forests removes fuel ladders, opens roads in the event a fire occurs, and replaces tanoak with more fire-resistant redwood and Douglas fir.

But it is also the result of poisoning trees and leaving them standing for up to a decade. Standing dead trees are what they call fuel ladders, and one of the recommendations Forestland Steward makes for fire protection is to "remove fuel ladders that would lead a fire into the crowns of trees," – one of the most dangerous situations for fire fighters. "When

trees die," the newsletter says, "they add to the already excessive fuel loads in the forest. Dead trees ignite faster and burn hotter than living trees. They torch quickly, with fire moving into the crown where it can jump to nearby trees. ... In overcrowded conditions, there are nearly always trees or fuel ladders nearby to spread the fire."

Recent fires in Mendocino County show little to no correlation between high fire intensity and tanoak treatment areas. In fact, some wildland fires were stopped in areas where tanoak had been treated. The fuel ladders had been removed prior to tanoak treatment, keeping the fire on the ground.

MRC has reviewed its internal policies to encourage fire safety. These include procedures and processes we have used for more than a decade, such as:

- a. Partnering with communities to place dedicated fire-water tanks, improve egress for remote neighbors and coordination of activities with local fire districts.
- b. Working in Sacramento to encourage investment in Mendocino county infrastructure through the return of taxes paid locally and deployment of CalFire resources.
- c. Donations of time, equipment and money to Volunteer Fire Departments.

MRC strengthened its practices to improve coordinating with local fire districts, fire experts, climate experts and CalFire on pilot projects for fuels hazard reduction and additional road access in the remote parts of the County.

As things stand now, MRC can't be held responsible if these trees fuel a forest fire. It is a potential cost of hundreds of millions of dollars to Mendocino County, but MRC would be completely off the hook. The county can't afford such an expense, but the Fisher family are billionaires. They are doing their best to avoid this liability. The Fishers have cranked up their public relations department, (which has so far done a pretty good job "greenwashing" their questionable, logging behavior). Locally, they have launched a high powered publicity campaign to convince us that hack-and-squirt is a harmless process. They call it a "treatment," avoiding the real issue of fire danger from dead standing trees. They have been buying half-page newspaper ads with condescending headlines reading, "Dear Colleagues, Friends and Neighbors in Mendocino County." (That stuff

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may work in San Francisco, but it doesn't fly so well up here.) In addition, MRC has turned their lawyers loose on the problem, claiming the County has no jurisdiction over either herbicides or timber harvesting. That may be true, but the Supervisors do have responsibility to protect their constituents from a public nuisance.

Anything threatening the safety and welfare of the public is a public nuisance, and trees that are intentionally killed and left standing as fire danger, would certainly fall under that definition. If the Supervisors declare these dangerous practices a public nuisance and a fire breaks out, then MRC has to bear at least a portion of the financial burden. That is why they are fighting so hard against it. Fire danger is increasing and standing dead trees make it worse. Obviously, a tree killed by poison is just as dangerous as a tree killed by insects, drought or disease. Intentionally killing large swathes of trees by hack-and-squirt is sheer stupidity. It is a danger. It is a problem. It is a public nuisance. And it's time the Board of Supervisors called it what it is.

Tom Fristoe, Willits

requires mitigations where appropriate.

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MRC was created in 1998 from lands purchased in Mendocino and Sonoma county with the publicly declared mission to be good stewards of the forest and at the same time run a successful business.

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 the forest and at the same time run a successful business. We have made significant progress in that regard:

- Adopting policies to make MRCs forestlands FSC certified (since November 2000);
- Adding more than 1 billion board feet of redwood and Douglas fir trees by lowering the rate of harvest;
- 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;
- 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;
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- Employing about 300 skilled employees in Mendocino County earning family-level wages and benefits.

MRC is regulated by seven (7) state and federal agencies, including CalFire. Additionally, MRC voluntarily subjects itself to third part verification of forest practices under the guidelines of the Forest Stewardship Council (FSC) and has done so since 2000. We publish our inventory and many other details of our forest management on our website It is straightforward to find information on our management of the forest.

From our inception we have encouraged transparency and we have a publicly stated policy of taking anyone to anywhere on the property at any time to see our practices first hand. Please contact John Andersen at 707-272-1177 to arrange for a tour. Additionally, we post our inventory and other forest facts on our website. You can find more information at www.mrc.com.