



One Maritime Plaza  
Suite 1400  
San Francisco, CA 94111  
(415) 392-3600  
[www.mrc.com](http://www.mrc.com)  
[www.hrcllc.com](http://www.hrcllc.com)

September 22, 2016

Charlton H. Bonham  
Michael Cohen  
Eric Sklar  
Wildlife Conservation Board  
1807 13<sup>th</sup> Street, Suite 103  
Sacramento CA 95814

Dear Board Members,

I am writing to you as an engaged member of the public, and I believe sharing a goal with each of you for seeing our collective resources utilized in a manner to achieve the best outcomes possible in further protecting the environment in California.

I also am writing with the benefit and perspective of being responsible, at least in part, for overseeing the Forest Stewardship Council certified operation of 440,000 acres of commercial redwood forestlands on the north coast for California (via Mendocino Redwood Co and Humboldt Redwood Co). At MRC and HRC our mission is to operate our lands as good stewards while also being a successful business. Over almost 20 years of operation we have added more than 1.5 billion board feet of standing timber to our forest, held back more than 1.5 million cubic yards of sediment from the coastal streams running through our lands (enough dirt to fill 150,000 dump trucks), defined and protected old growth down to the level of each individual identifiable old growth tree, and successfully transitioned to an open and transparent business (see our websites [www.mrc.com](http://www.mrc.com) and [www.hrcllc.com](http://www.hrcllc.com) for substantial information about almost every measurable aspect of our forest).

My association with our forest business has given me a close-up view of the WCB's activities in an area of the state where we have developed great familiarity. Dating back to 2007, we began a public dialogue with the WCB (see <http://www.hrcllc.com/communications/bulletin-board/>) based on our observations that the state was overpaying to "protect" north coast timberlands from 1) the impact of illusory development threats and 2) concerns that California, with the highest regulatory standard of forest management in the country, needed to do even more to entice landowners to do a good job in how they managed their forests. The overriding guiding WCB policy for forest conservation at the time was "ecological integrity and economic stability". Nice sounding words but obviously broad enough to support any deal that might come along and appeal to staff. Our concerns were validated with the consummation of the Gualala and Usal deals in 2011, that were shown after the fact to have been based on faulty appraisals (see our letter dated April 10, 2012, for details - which was never answered by the WCB staff despite a commitment to do so).

For much of 2011 and well into 2012 we asked for increased transparency for WCB deals that were of size (see our letter dated May 29, 2012). We raised this issue in the public portion of board meetings and then participated in a working group that was formed and met several times in person to study the

issue. While the WCB adopted an appraisal review requirement in May 2012 for certain large deals (which the above referenced Gualala and Usal deals were also essentially subjected to on an ad-hoc basis before being consummated), greater steps to improve transparency were deferred to allow the WCB to instead conduct a more comprehensive strategic planning effort. The strategic plan effort was committed to by the board sometime in 2012, and took until August 2014 to be completed. As an aside, in November 2013 the staff proposed to abandon the adopted appraisal review policy, however the board wisely rejected this request.

I personally participated in several of the strategic planning working group sessions. The final document is a nice framework, however most people would probably agree that the heart of any prioritization to come from the strategic plan was deferred to a "Dialogs on Conservation" (to be completed by summer 2015), and a "Conservation Summit" (to be completed by winter 2015) to explore "how the State can achieve greater conservation impact through the establishment of relative priorities." (page 46 of strategic plan) Similarly, a critical element in the goals sections was the idea of "Focus[ing] habitat protection on statewide conservation priorities..."

I provide the feedback below in response to the staff write up for Monday's Conservation Summit meeting:

- the Dialogs in Conservation was completed with a ten question internet survey sent to 90 people and then another 33 interviews. Several of the questions asked in the survey were technical and process related in nature. The key issue of rating conservation objectives came in the form of a multiple choice question with seven specific suggested objectives and also a box for "other." Perhaps an oversimplification, but the heart of a now four year strategic planning process in some ways appears to have been boiled down to an internet survey among 90 people with a multiple choice question for ranking suggested answers.
- Maybe more came out of the interview process, but it is hard for me to know. I was solicited for the ten question survey, but was not contacted for an interview. Given that over a number of years we have written eight distinct letters to the WCB making substantive comments about WCB processes, and we were an active participant in numerous public strategic planning sessions (including personally participating in the formulation of some of the language), and that we oversee 440,000 acres of FSC certified forestland, it seems like a miss in the process to have not been called.
- The write-up for Monday notes (on page 6) that there were no comments on transparency issues associated with the WCB. At least by my read, however, transparency was not raised as a topic in the ten question internet survey (and of course has been resisted by funding agents and WCB staff alike for years).
- Perhaps most worrisome of all, when trying to summarize the staff recommendation for this "Conservation Summit," it feels like the biggest take away (see page 8 and 9 of the staff report) is
  - o Linkages/Connectivity
  - o Climate Change
  - o Water resources

- o with a nod given to NCCP/HCCPs and CAPPs, and public access.

It is easy for anyone to think that projects that support linkages, water and climate change are appealing, but there is no proposal for any measurable goal or weighting or conclusion from such broadly stated objectives, or at least there is measurable goal that I as a layperson can take away from what is described. Said another way, we can all agree that the WCB should seek to complete projects that are good for the environment, but that is not an adequate actionable goal.

“Ecological integrity and economic stability” gave us \$40 mm of money into Usal and Gualala (plus a variety of other suspect north coast conservation deals). I highlight Usal and Gualala as those deals stand out for the lack of ecological accomplishment relative to the funds expended, justified by faulty appraisals that were knowingly withheld from the public until after the deals were done. Failure to adopt more understandable and especially measurable goals and priorities leaves the board in the same vulnerable position it has long held – having to make up or down votes on whatever is brought forth by the staff, without any obvious measurable goals that can be assessed over the intermediate to long term. With four years of effort in the strategic planning process, it would seem reasonable to expect more for clarity and long term accountability of goals.

Before adopting such broad outlines, please reconsider if the board can find ways to express more of a point of view of what they hope the WCB can achieve for the long term. The strategic plan should outline objectives and goals that are measurable, accountable and transparent to the public, and meet reasonable expectations for effective governance in the 21<sup>st</sup> Century.

Sincerely,



Sandy Dean  
Chairman, Mendocino Redwood Co LLC, and  
Humboldt Redwood Co LLC

cc John P Donnelly