

“Stop the Extinction of Northern Spotted Owls by the Fisher Family” by Tom Wheeler was published on the Environmental Protection Information Center’s website on May 8, 2023.

Humboldt Sawmill 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 in green italics.

Substantial factual information on Mendocino and Humboldt Redwood forests and its practices are available at [www.mendoco.com](http://www.mendoco.com).

<p>Text of Article <i>Text of article begins below, spaces placed to allow facts to line up with text of article.</i></p>	<p><b><i>Humboldt Sawmill Company Facts, Corrections, Clarifications, and Commentary</i></b></p>
<p>[ BEGINNING OF ARTICLE BELOW]</p>	<p><i>Humboldt Redwood Company (HRC) was created in 2008 from lands purchased in Humboldt 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:</i></p> <ol style="list-style-type: none"> <li><i>1. Adopting policies to make HRCs forestlands FSC® (C031337) certified (since 2009);</i></li> <li><i>2. Adding more than <u>1 billion board feet</u> of redwood and Douglas fir trees by lowering the rate of harvest;</i></li> <li><i>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;</i></li> <li><i>4. Elimination of traditional clear cutting from our property;</i></li> <li><i>5. Long term investments to improve habitat for fish across the property by controlling or holding back more than 470,000 cubic yards of sediment (more than 47,000 dump trucks of dirt) from the coastal streams flowing through our forest;</i></li> <li><i>6. Stormproofing approximately 680 miles of forest roads on our ownership.</i></li> <li><i>7. Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;</i></li> <li><i>8. Completing a substantial rebuild of our Scotia sawmill, assuring that Humboldt</i></li> </ol>

[ BEGINNING OF ARTICLE]

The Humboldt Redwood Company and Mendocino Redwood Company, both owned by the billionaire Fisher family, are allowing northern spotted owls (*Strix occidentalis caurina*) to go extinct on their properties.

One of the greatest threats currently facing the northern spotted owl is the takeover of invasive barred owls (*Strix varia*), which both attack and outcompete northern spotted owls. Northern spotted owls are so afraid of barred owls that they will no longer respond when surveyors make owl calls. Click here to learn more about how to differentiate spotted and barred owls.

In response to the spotted owl's looming extinction on Humboldt and Mendocino Redwood Company land, the U.S. Fish and Wildlife Service convened a panel to recommend changes to stop the spotted owl's swift decline. The panel, led by renown owl researchers, advised that the company begin a barred owl removal program. Barred owl removal has been shown to be extremely effective in reversing long-term spotted owl declines, including on the adjacent property of Green Diamond Resource Company. In spite of best available science, the Fisher family's Humboldt and Mendocino Redwood Companies are refusing to implement barred owl removal.

[ARTICLE CONTINUES BELOW]

*County will have infrastructure in the processing of wood products for many years to come; and*

9. *Employing more than 300 employees contributing a payroll of more than \$23 million and another \$75 million paid for contractors, supplies and raw material purchases flowing through the local economy*

*Both companies monitor northern spotted owls according to protocols established by state and federal wildlife agencies. All protection measures are strictly adhered to for nesting sites and retention of habitat surrounding these sites.*

*It is widely accepted that the barred owl is impacting populations of northern spotted owls. At Mendocino Redwood Company, annual counts of spotted owls show a dynamically stable population trend from 2001-2016 followed by a decline from 2017 to 2022. Similar results were found at Humboldt Redwood Company. This is due to barred owl presence.*

*Barred owl "removal" involves baiting then shooting and killing the barred owl. Government agencies have previously implemented the killing of one species for the benefit of another. Sometimes it works, many times it doesn't. Killing barred owls has occurred for more than a decade in various forms and yet they continue to thrive. We have asked how many generations of barred owls must be killed. Is the expectation to perpetually shoot barred owls? We understand killing barred owls is limited to our region to create what regulators and researchers have called a "wall" to stop further migration of barred owl. What happens when the killing stops? Barred owls continue to migrate. Will regulators insist on shooting them all the way back to Eastern Canada where they came from?*

Why might that be? Fewer spotted owls mean more old, large trees that the companies can log. Legal protections for the northern spotted owl, which is listed as threatened under the federal and California Endangered Species Acts, currently serve as a limit to harvesting mature forests. If the owl went missing from their properties, however, the companies would be allowed to harvest large, old trees previously off limits. By allowing massive barred owl invasion of their properties, the Fisher family gets rid of spotted owls while under the guise that they have clean hands.

This is not acceptable. Given the large scale of the Fisher family's ownership of the redwoods, unchecked barred owl expansion will result in the extinction of spotted owls in the redwoods. The company has built its reputation as "different" from other industrial timber companies, but increasingly the company has failed to live up to that claim.

EPIC is filing a complaint with the Forest Stewardship Council (FSC) against the Humboldt Redwood Company. A company can't be certified as "sustainable" if it voluntarily allows for the extinction of spotted owls. The Humboldt and Mendocino Redwood Companies and the Fisher family also need to hear from the community that allowing northern spotted owls to go extinct is unacceptable.

[END OF ARTICLE]

*Protection of northern spotted owls on Humboldt Redwood Company lands is guided by a Habitat Conservation Plan (HCP) which is regularly reviewed by state and federal agencies. Protection of northern spotted owls on Mendocino Redwood Company lands is guided by Northern Spotted Owl Take Avoidance Analysis and Guidance for Private lands in California prepared by the US Fish and Wildlife Service. These two documents contain many provisions for the retention of nesting, roosting, and foraging habitat for the northern spotted owl, regardless of the actual presence or absence of spotted owls in the forest.*

*While HRC has agreed in concept to barred owl removal on our property, things are complicated by the existing Habitat Conservation Plan. As recently as this month and for dozens of meetings over the preceding years, we have discussed barred owl removal and updates to our permits to accommodate killing of barred owl. We have reviewed alternatives and worked with agencies and interested parties to define the objective, limit the scope to actual research with timely review of success/failure, and to be circumspect in understanding the killing of an owl. The response has been disappointing. HRC continues to engage with regulators and interested parties to find innovative methods to protect the NSO and other species on our property.*

*Timber harvesting is regulated by the California Forest Practices Rules which are the most rigorous regulations in the nation when it comes to forest management. 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. THPs*

*are also reviewed by Regional Water Quality Control Boards and the CA Department of Fish and Wildlife.*

*Humboldt Redwood Company (HRC) was created in 2008 from lands purchased in Humboldt 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:*

- 1. Adopting policies to make HRCs forestlands FSC® (C031337) certified (since 2009);*
- 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 470,000 cubic yards of sediment (more than 47,000 dump trucks of dirt) from the coastal streams flowing through our forest;*
- 6. Stormproofing approximately 680 miles of forest roads on our ownership.*
- 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 Scotia sawmill, assuring that Humboldt County will have infrastructure in the processing of wood products for many years to come; and*
- 9. Employing more than 300 employees contributing a payroll of more than \$23 million and another \$75 million paid for contractors, supplies and raw material purchases flowing through the local economy.*

*HRC and MRC is regulated by seven (7) state and federal agencies, including CalFire. Additionally, HRC and MRC voluntarily subjects themselves to third part verification of forest practices under the guidelines of the Forest Stewardship Council FSC® (C031337) and has done so since 2009. 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 to see our practices first hand. If you are unable to make the trip you may find videos of our activities in the forest at <https://www.hrcllc.com/videos>*

*Please contact HRC through their website to arrange for a tour. Additionally, we post our inventory and other forest facts on our website. You can find more information at [www.mendoco.com](http://www.mendoco.com)*