

“The California Timber Battles Shift to New Grounds” by Glen Martin was published in the *Cal Alumni Association* website on February 13, 2018.

Humboldt 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 in green italics.

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

<p style="text-align: center;">Text of Article <i>Text of article begins below, spaces placed to allow facts to line up with text of article.</i></p>	<p style="text-align: center;"><i>Humboldt Redwood Company Facts Corrections, Clarifications and Commentary</i></p>
<p style="text-align: center;">[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"> <i>1. Adopting policies to make HRCs forestlands FSC® (C031337) certified (since 2009);</i> <i>2. Adding more than 500 million board feet of redwood and Douglas fir trees by lowering the rate of harvest;</i> <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> <i>4. Elimination of traditional clear cutting from our property;</i> <i>5. Long term investments to improve habitat for fish across the property by controlling or holding back more than 400,000 cubic yards of sediment (more than 40,000 dump trucks of dirt) from the coastal streams flowing through our forest;</i> <i>6. Stormproofing approximately 527 miles of forest roads on our ownership.</i> <i>7. Operating as an open and transparent business; including an open invitation to take interested individuals anywhere in the forest;</i> <i>8. Completing a substantial rebuild of our</i>

<p style="text-align: center;">[BEGINNING OF ARTICLE]</p> <p>California’s Lost Coast isn’t that hard to find— just drive south on a narrow, twisting road from the Humboldt County town of Ferndale. The landscape is extreme in its beauty, wending across ridge top meadows that plunge eastward to forested gorges and roll to the cobalt blue Pacific to the west. The route skirts miles of deserted beach where the only sound is the lapping of gentle surf and the cries of seabirds, and finally tracks through Petrolia, a tiny settlement on the Mattole River. It is a clean and lovely little town, sheltered by big trees and pervaded by a deep and abiding peace.</p> <p>But Petrolia isn’t Brigadoon; it still exists in the real world, so even here there are tensions. Some have to do with the marijuana trade, a pillar of the local economy. And there’s another conflict besetting the Mattole Valley, one with roots in the late 1980s, when the North Coast seethed with the logging protests that culminated in Redwood Summer. By the time California’s timber wars reached an uneasy truce in the late 1990s, some laudable things had been accomplished, most notably the creation of the Headwaters Forest Reserve, a 7,472 acre parcel of conifers and hardwoods that includes a 3,088 acre core of gigantic, old-growth redwoods. Today, the news is pretty upbeat about the redwoods. Virtually all the remaining ancient trees are protected to a significant degree and ambitious restoration efforts are planned for the 95 percent of the redwood forest that was logged during the past 150 years.</p> <p style="text-align: center;">[ARTICLE CONTINUES]</p>	<p><i>Scotia sawmill, assuring that Humboldt County will have infrastructure in the processing of wood products for many years to come; and</i></p> <p>9. <i>Employing about 250 skilled employees in Humboldt County earning family-level wages and benefits.</i></p> <p><i>Since our inception, Humboldt Redwood Company (HRC) has a policy of protecting old growth trees, down to an individual tree. Please visit our website for additional details regarding this policy: https://www.hrcllc.com/old-growth</i></p> <p><i>Also since our inception, HRC has been involved in numerous restoration efforts from restoring critical steelhead and coho salmon habitat, removing roads</i></p>
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But that's not to say the state's timber conflicts are over. They're not full-blown campaigns with the civil equivalent of armor, infantry and air support—more like a simmering insurgency characterized by intractable hotspots. And perhaps the hottest spot these days is Rainbow Ridge, an 18,000 acre tract on the headwaters of the upper and lower forks of the Mattole River. The battle over Rainbow Ridge isn't about old-growth redwoods, however. It's centered on Douglas firs.

As a species, Douglas firs are by no means endangered; they're distributed throughout much of the American West and Canada. But as with redwoods, most of the ancient Douglas fir forests have been logged. Ancient stands of Douglas fir, especially coastal Douglas firs, are exceedingly rare. Rainbow Ridge includes about 1,100 acres of old-growth Douglas fir and associated hardwoods, perhaps the largest extant tract of this forest type. Some of the firs are 300 years old, but they may not be around forever. The land is owned by Humboldt Redwood Company a sister firm to the Mendocino Redwood Company, and the State of California has approved three timber harvest plans (THPs) for the property.

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near streams, and cutting less than we grow each year to improve upland wildlife habitats. Please visit our website for additional details on this important work: <https://www.hrcllc.com/forest-road-restoration>

HRC's old growth policy states a Douglas fir is considered old growth when it has been established since 1800 and is at least 36" in diameter. Smaller and younger Douglas fir can be classified as old growth as well if they have certain characteristics common to old growth trees. Please visit our website for additional details regarding this policy: <https://www.hrcllc.com/old-growth>

HRC has identified a 202 acre forest in the Rainbow Ridge area (specifically Long Ridge) within our ownership that largely contains old growth trees. This area has been protected as a High Conservation Value Forest as defined by the Forest Stewardship Council. Approximately 24 additional acres have also been identified as old growth in smaller, scattered acreages in the Rainbow/Long Ridge area. Numerous individual old growth trees have also been identified in this area. As mentioned earlier, all individual old growth trees are retained on the HRC ownership.

Humboldt Redwood Company is by no means comparable to Maxxam Corp, a firm that was widely regarded by environmentalists as a rapacious, cut-and-run timber outfit during the redwood skirmishes. Indeed, MRC/HRC—which took over the subsidiary Pacific Lumber Company from Maxxam—prides itself on sustainable forestry, and harvests and markets its timber under Forest Stewardship Council certification.

The company has announced that it does not intend to cut 86 percent of the ancient trees covered by its Rainbow Ridge THPs.

Those protections are not necessarily permanent, however. Moreover, HRC maintains the option of logging Rainbow Ridge’s remaining 14 percent of old-growth stocks, and therein lies the roots of the conflict. A group of Mattole Valley residents maintain Rainbow Ridge is a nonpareil, a property so unique, supporting forest ecosystems so rare, that it should never be logged. Given the impacts of climate change, they claim, its higher value is as a research center to study the potential of old-growth forests for carbon sequestration and water retention. Accordingly, the group wants the property transferred to the UC Natural Reserve system, an ambition that is garnering support at the university.

“It would be an incredibly exciting addition to UC’s Natural Reserve System,” says Trevor Keenan, a scientist in the climate and ecosystem sciences division of Berkeley Lab.

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From 1995 through 2007, an average of 187 million board feet (MMBF) of timber was harvested annually by Maxxam. This harvest ranged from a low of 82.5 MMBF (in 2007) to a high of 295.3 MMBF (1996). HRC has substantially reduced the annual harvest since it took ownership in 2008. The annual harvest on HRC land has been 52 million board feet.

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In rare instances, the cutting of an old growth tree is required for road construction or workplace safety considerations. Trees cut under these circumstances will be left in the forest to provide large wood on the forest floor.

HRC’s old growth policy was established at the inception of the company in 2008 and is closely tied to our certification with the Forest Stewardship Council. It follows along the Old growth policy established in 2000 by our sister company Mendocino Redwood Company. The process of establishing the Old Growth policy was rigorous. Subsequent changes and improvements to the Old Growth policy have been equally rigorous including evaluation against the FSC® standards and consideration of multiple stakeholder input.

“Rainbow Ridge has the largest intact old-growth Douglas fir forest in California. What makes it particularly valuable is the various states of old-growth stands. Some are more than 300 years old, some 150 to 300 years old, and some 100 to 150 years old. That provides a fantastic chance to obtain not just old-growth data, but data from old-growth forests in different stages.”

That’s especially important, says Keenan, because terms such as “old-growth” and “forest maturity” are poorly defined. Generally, a forest is assumed to be mature when it approaches equilibrium with its environment under normal conditions. The problem, says Keenan, is that we currently are not experiencing normal conditions. Ongoing climate change has skewed what were once considered reliable baselines. Increased human-induced carbon dioxide in the atmosphere acts as a fertilizer in forest ecosystems, and trees become more efficient in processing water and nutrients. At the same time, climate change portends more heat and drought for forests, so configuring that factor with increased forest efficiency is extremely challenging.

“Also, as forests get more efficient, there could be a lot more water retention in forest systems [which could be good for municipal and agricultural water supplies],” says Keenan. “But at the same time, that could encourage the spread of trees into areas that are sparsely forested, and that could consume more water. So it gets complex. We need to develop new equilibrium curves because the old equilibrium curves just don’t apply anymore. That’s why Rainbow Ridge presents such a tremendous opportunity. It’s not just the old-growth trees, but the different stages of older trees, and the large intact suites of associated species. [A reserve designation] would allow scientists to combine critical natural resources with deep academic resources.

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For me, that seems like a much higher value than logging, no matter how progressive [the harvest plans are].”

Certainly, Mattole Valley residents feel the same way, forming an ad hoc group, the Lost Coast League, to stop logging on Rainbow Ridge and transfer the property to the UC Natural Reserve system. The group has attempted to negotiate with Humboldt Redwood Company, says Robert Yosha, a fisheries biologist and Lost Coast League member, without success. The company points to its agreement to forego logging on a significant portion of Rainbow Ridge and its commitment to sustainable forestry as ample proof of its good faith. But that’s not enough, says Yosha.

“We don’t object to their managing their [timber] plantations as plantations,” Yosha says. “But that’s just it—Rainbow Ridge is not a plantation. It is one of the last large stands of old-growth coastal Douglas fir left on the continent. Coastal Douglas firs are comparable to redwoods in size and carbon sequestration potential. There’s evidence, in fact, that they have the biological potential to exceed redwoods in height, and that they were the tallest trees on the planet prior to [Euro-American] settlement. We don’t see those trees now, of course, because they were all logged.”

Nate Madsen, a Lost Coast League member who spent two years perched in a redwood tree to protest old-growth logging when the timber wars were at their peak, said full protection for the ridge is necessary because any logging—no matter how “sustainable”—chips away at an irreplaceable resource.

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HRC has been very involved with the Mattole community regarding forest management on our ownership. Since 2008, HRC staff has conducted 13 field tours involving over 30 individuals, 6 stakeholder meetings, and over 70 email and phone conversations. Conversations continue with local neighbors and interested parties. As a result of these interactions, this document was prepared: <https://www.hrcllc.com/letters/mattole-2016-managing-humboldt-redwood-companys-ownership-mattole-river-watershed-0>

HRC practices a form of forest management (selection or uneven-aged management) whereby trees are retained in various age classes and densities. Plantations are usually associated with a form of forest management whereby most, if not all, of the trees are harvested, then replanted at a specified spacing.

“When the Headwaters deal was concluded [in 1999] there were probably 10,000 acres of old-growth forest, both conifers and hardwoods, on Rainbow Ridge,” says Madsen. “Now it’s down to 2,000 to 3,000 acres. In many ways, Rainbow Ridge was the trade-off for Headwaters. It’s the orphan of Headwaters.”

Michael Evenson, a Lost Coast rancher, and a 1967 Cal graduate, says Rainbow Ridge also is inappropriate for commercial logging, sustainable or otherwise, due to the highly unstable soils of the Mattole watershed. The U.S. Geological Survey studied the region in the late 1990s, says Evenson, and concluded it was not a good area for commercial timber production.

“We have major landslides here on a regular basis, even in areas that aren’t subject to active logging,” Evenson says. “We need this watershed studied objectively and thoroughly, which is why we want UC researchers involved. We know what [HRC] says, but we need real science, not timber company science.”

In a 2017 letter to Mattole Salmon Group co-founder and Lost Coast League ally David Simpson (a Cal grad), Humboldt Redwood Company CEO Sandy Dean cited the firm’s judicious approach to its Rainbow Ridge holdings.

“...The Mattole represents about 9% of our Humboldt forest in acres,” Dean wrote. “The aggregate standing timber volume on these 18,000 acres is estimated at approximately 250 million board feet, and our cumulative harvest in this area since HRC’s formation in 2008 has been

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A California licensed geologist reviews and approves all Timber Harvest Plans to ensure our practices are protective of soils and slope stabilities. These plans are further reviewed by a state licensed geologist employed by the California Geological Survey in the Department of Conservation.

HRC completed a thorough assessment and review of the Mattole Watershed through the Watershed Analysis requirement described in our Habitat Conservation Plan. The cumulative effects section of our watershed analysis for the Mattole River is available on our website at:
https://www.hrcllc.com/pdf/Watershed_Analysis/HRC/MattoleCWErpt_PRDSept2011.pdf

Sandy Dean is Chairman and Bob Mertz is the CEO for the Humboldt Redwood Company. Here is the email from Sandy Dean to David Simpson:
https://www.hrcllc.com/sites/default/files/inline-files/SD_Email_DSimpson_Mattole_08_02_2017.pdf

less than 2 million board feet of timber (less than 1 % of today's aggregate inventory in the Mattole)..."

Dean further noted harvest acres had been reduced from 715 acres to 285 acres following concerns expressed by logging opponents, and that 202 acres had been designated a "...High Value Conservation Area in accordance with [Forest Stewardship Council guidelines], and this designation will remain with these acres." Further, wrote Dean, an additional 24 acres was subsequently set aside because it had been determined they met FSC criteria for old-growth tree protection.

But, Dean noted, he differed with Simpson's contention that the 1,100 acres of disputed forest on Rainbow Ridge "...are too special for any management regardless of the standard employed...forest management policy has to acknowledge the use of wood in our society. In recent years California has imported close to half the lumber consumed in the state. Further setting aside acreage in the Mattole in the name of the environment might feel good, especially for our closest neighbors, but it will result in other trees being harvested somewhere—most likely in Oregon, Washington, or Canada – where harvest standards are much different than the regulatory minimums of California and much less than the standards employed by HRC. Where is the environmental win in that?"

Reached by email, Dean stated that MRC and HRC "...have worked to demonstrate that it is possible to be both good stewards of the land and also be a successful business." When asked about transferring Rainbow Ridge to the UC Natural Reserve system—either through outright purchase or a long-term preservation agreement known as a conservation easement —Dean demurred.

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Here is the email from Sandy Dean to David Simpson:
https://www.hrcllc.com/sites/default/files/inline-files/SD_Email_DSimpson_Mattole_08_02_2017.pdf

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“The company wishes to continue to manage all our lands for the long term in accordance with the exemplary standard of the Forest Stewardship Council certification...” Dean stated. “...Said another way, MRC and HRC have worked since their founding to show that commercial operation of a forest can produce positive environmental outcomes. For MRC and HRC, these goals outweigh possible PR gains or money from piecemeal sales of portions of the forest.”

But Dean’s rationale misses the point, say opponents. Rainbow Ridge is special, and logging it would be no more appropriate than quarrying Half Dome for its granite. Frustrated by their interactions with Dean, Lost Coast League members have endeavored to contact the Fisher family, the owners of MRC/HRC and The Gap Inc., and an Old Money San Francisco clan long known for their commitment to environmental causes.

“We’ve sent them two letters inviting them to visit and discuss our concerns, but we haven’t received any response,” says Ellen Taylor of the Lost Coast League.

Dean stated that the Fishers received the letters and passed them on to him; he acknowledged that he failed to respond in a timely fashion to the first letter, but that he and Taylor subsequently had numerous phone conversations and met for lunch in Ukiah to discuss Rainbow Ridge. As for logging opponents meeting with Fisher family members to present their case, Dean emailed, “...The Fishers have left day-to-day implementation of the mission and goals of HRC and MRC (seeking to be good stewards of the land and a successful business, and managing our lands to the exemplary Forest Stewardship Council standard for the long term) to me and the local MRC/HRC operating management.”

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In any case, says Lost Coast Leaguer Gabrielle Ward, HRC's plans are predicated on outmoded information that doesn't reflect the true capacity of North Coast forests to produce timber sustainably, especially in an era of accelerating climate change.

"They're basing their plans on 1990 data, and they don't come close to adequately addressing climate change impacts," Ward says. "The documents are simply out of date. What it gets down to is Dean's belief that in the end, the landscape—all of it—must pay, no matter what. That isn't sustainable forestry."

That perspective more or less jibes with that of former California Department of Forestry Director Richard Wilson, a long-time critic of logging practices in the state. Wilson says both private and federal forests in California were logged rapaciously through the end of the 20th Century, and that the "sustainable" logging that is now occurring generally isn't meeting professed goals.

"When you drive Highway 101 around Ukiah, you see the logging trucks and they're all carrying 16-inch diameter logs," Wilson says. "That's all small diameter chip-and-glue stuff. Any good builder will tell you it makes lousy lumber. "The big trees are all gone, and the mills have all been converted to accommodate the smaller logs. The emphasis is on the small stuff [not on growing larger, older trees]."

Wilson observes the California Air Resources Board is issuing carbon offset credits to timberland owners, basically paying corporations and other groups for the standing timber growing on their lands. Because trees sequester planet-warming carbon dioxide from the atmosphere in their trunks and roots, they can

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HRC recently completed an updated forest inventory to ensure we are on track to meet the goal of increasing the number and size of conifers on the ownership. This inventory guides the location and timing of harvests throughout the ownership to meet this goal.

Mendocino and Humboldt Redwood Companies significantly reduced the harvest level when the forestlands were purchased in 1998 and 2008, respectively. Since their inceptions more than 1 billion board feet of redwood and Douglas fir have been added to MRC forestlands and over 500 million board feet have been added to HRC forestlands.

Humboldt Redwood Company has successfully reintroduced products to the market made from larger second growth trees. These products include timbers, dimension lumber and finish lumber. The objective to be environmentally sensitive and economically successful business drives HRC Forest management to grow larger better second growth in order to sustain long term success on significantly lower harvest levels when compared with the history of these areas.

Carbon offset projects compensate landowners for retaining more trees on their ownership than required under regulations such as the Forest Practice Rules. These projects are initiated after careful forest inventories are completed that require extensive verification prior to implementation.

help mitigate climate change. Such programs aid timber companies in securing FSC certification and publicizing their earth-friendly practices.

“What worries me is that these [carbon offset credit] contracts are not being properly written, implemented, and monitored,” says Wilson. “Over-cutting clearly remains a problem, even as these companies receive money from the state for their carbon offset credits. We need vigorous and careful review of these programs.”

Further, says Ward, FSC certification isn’t an adequate safeguard for rare old-growth forests such as those on Rainbow Ridge.

“The company can harvest under FSC criteria until it has taken all the timber the guidelines allow,” says Ward. “At that point, there’s still going to be plenty of standing timber—in fact, what’s left will invariably be the oldest, most valuable timber. So then they can simply forego FSC certification and cut the remaining trees. They won’t be able to sell it as FSC-certified, but they’ll get premium prices and they’ll have a ready market for it. That isn’t long-term forest protection.”

[END OF ARTICLE]

HRC and MRC are sequestering more than 1 mm tons of carbon per year and to date have neither sought nor received any compensation for doing so.

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Certification through the Forest Stewardship Council is an important component of our business. It is also important to ensuring we are achieving ecological restoration goals. The standards for FSC® were established by leading Environmental organizations and include specific protections for old growth. HRC commitment is to ALL FSC® standards including old growth. HRC performance against FSC® standards is audited annually by a third party and the reports are publically available here:

<https://www.hrcllc.com/certification-reports>

As the toughest standard for environmentally exemplary forestry, HRC remains committed to FSC® certification.

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- 1. Adopting policies to make HRCs forestlands FSC® certified (since 2009);*
- 2. Adding more than 500 million board feet of redwood and Douglas fir trees by lowering the rate of harvest;*
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implementation of a policy to protect all individual old growth trees across our property;

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- 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 about 250 skilled employees in Humboldt County earning family-level wages and benefits.*

HRC is regulated by seven (7) state and federal agencies, including CalFire. Additionally, HRC voluntarily subjects itself to third part verification of forest practices under the guidelines of the Forest Stewardship Council (FSC®) 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 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.hrcllc.com