

“Road to Nowhere—Humboldt Redwood Company Making a Mess of the Mattole” by Rob DiPerna was posted on the Environmental Protection Information Center website on February 20, 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 Forest Stewardship Council® (FSC® C031337) certified (since 2009);</i> <i>2. Adding more than <u>500 million board feet</u> 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>

[BEGINNING OF ARTICLE]

Humboldt Redwood Company doesn't seem to be learning the lessons handed down by its predecessor, the now-bankrupt Pacific Lumber Company. Faced once again with community and activist resistance to its plans to log previously-unharvested and extremely rare upland Douglas-fir forests, the Company is resorting to some very Hurwitz-era tactics by proposing to construct over 1,000 feet of new road along Long Ridge in the North Branch of the North Fork of the Mattole Watershed for seemingly the sole purpose of circumnavigating community and activist resistance to its logging plans.

HRC has proposed a major amendment to THP 1-12-026HUM, the "Long Ridge Cable" THP, erroneously arguing that the new road segment is necessary to facilitate greater access to the Mattole property for timber management and fire suppression activities, without offering any explanation or rationale as to why the pre-existing road network, which it has already used to conduct partial harvesting operations, is not sufficient to do the job.

Behind the scenes is a live and real controversy over the company's claim that the forests to be logged are not "primary forests," as defined by the Forest Stewardship Council (FSC), triggering additional conservation requirements and HRC's refusal to entertain a proposal by the local community to purchase the land for conservation purposes. Why? The answer seems to be that HRC bought damaged goods from Pacific Lumber on the whole as a property

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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.*

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>

Humboldt Redwood Company has reviewed the FSC® definition of primary forests in great detail and in conjunction with third party auditors to ensure compliance with FSC® principles and criteria. For a more detailed discussion on primary forests in the Mattole River watershed please review this document: <https://www.hrcllc.com/letters/mattole-2016-managing-humboldt-redwood-companys-ownership-mattole-river-watershed-0>

investment, and the forests of the North Branch of the North Fork of the Mattole represent the last of the best of what the company has left to work with to meet the financial bottom-line for their owners, the San Francisco-based billionaire Fisher family, which is notorious for the Gap clothing company.

HRC, EPIC, and Mattole community interests and activists have spent the better part of the last five years interacting over the potential fate and management of the North Branch of the North Fork Mattole holdings, with Humboldt Redwood Company once-promising an open and transparent collaborative solution-based process. For years, HRC honored that agreement and we made headway in addressing the controversy. Forest defenders came out of the woods and there was a truce. That has unfortunately ended, as HRC announced that it plans to move forward, simply announcing its findings and decisions without any effort to collaboratively or openly solve the continuing disputes through direct dialogues.

Faced with Mattole community and activist resistance to the logging it proposes, HRC has chosen to forge stubbornly ahead and to propose what is clearly unnecessary additional road construction under false and erroneous pretenses.

Because the amendment to allow the road construction to go forward constitutes a major change to the Long Ridge Cable THP, HRC must go through the normal THP review process, including allowing CAL FIRE and other agencies and the public to inspect and comment on the proposed new road construction. EPIC has submitted comments to CAL FIRE pertaining to the legality and legitimacy of the road construction amendment. Our comments on the Long Ridge Cable THP can be viewed here.

[ARTICLE CONTINUES]

HRC has been very involved with the Mattole community regarding forest management on our ownership. Since 2008, HRC staff have 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>

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EPIC urges HRC to abandon this ill-conceived and pigheaded approach to community engagement and to return to the table with EPIC, Mattole community interests, and activists to orchestrate a more genuinely collaborative and legitimate outcome for the rare, unique, and critically-threatened upland Douglas-fir forests of the North Branch North Fork Mattole.

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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;*
- 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 400,000 cubic yards of sediment (more than 40,000 dump trucks of dirt) from the coastal streams flowing through our forest;*
- 6. Stormproofing approximately 527 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;*

	<p>8. <i>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</i></p> <p>9. <i>Employing about 250 skilled employees in Humboldt County earning family-level wages and benefits.</i></p> <p><i>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.</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. If you are unable to make the trip you may find videos of our activities in the forest at https://www.hrcllc.com/videos</i></p> <p><i>Additionally, we post our inventory and other forest facts on our website. You can find more information at www.hrcllc.com</i></p>
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