

**MENDOCINO REDWOOD COMPANY
IN ASSOCIATION WITH HUMBOLDT REDWOOD
COMPANY**

**OPERATIONS MANUAL – MENDOCINO
REDWOOD COMPANY RESOURCE MANAGER
(MRCRM)**

Draft July 2003
Revised April 2012

Mendocino Redwood Company, LLC
850 Kunzler Ranch Road
P. O. Box 996
Ukiah, CA 95482

(707) 463-5110 - Main Number
(707) 463-5530 - Facsimile

Contents

Forward.....	3
The Mendocino Redwood Company Resource Manager Program (MRCRM).....	4
Introduction.....	4
Philosophy Statement.....	4
Program Background	5
Forest certification	5
Forest Stewardship Council (FSC)	5
Resource Manager Certification	5
Group certification	Error! Bookmark not defined.
Program Operation.....	7
Program Structure	7
Organizational Description	7
Responsibilities	9
Eligibility	12
Forest Owners and Forest Owner Representatives	13
Enrollment.....	13
Resource Managers	13
Group Enrollee Assessment.....	13
Monitoring / Auditing	14
Audit Frequency.....	16
Internal Program monitoring.....	17
Group Enrollees	17
Resource Managers.....	17
Monitoring Tools	18
Incorporating Findings and Recommendations	18
Corrective actions	18
Availability and Distribution of Monitoring Results	18
Disciplinary procedures	19
Dispute resolution	19
Dis-enrollment (destitution).....	20
Operational Activity Management.....	21
Chain of Custody	21
Policy Guidelines	22
Certification Compliance and Performance Evaluation Protocol.....	22
Contract and Service Provider Policies.....	23
Appendix 1 – Completion of operations checklist.....	25

Forward

Mendocino Redwood Company (MRC®) was created in July 1998 with a long-term investment by the Fisher family of San Francisco and their investment partners, while Humboldt Redwood Company (HRC) began operating on July 31, 2008, with a similar investment by the Fisher Family and their partners. From the beginning, both MRC and HRC have operated with a publicly declared purpose to demonstrate that it is possible to restore industrial forestlands as part of a viable business plan. Both companies long-term goal is to restore their property to a Redwood and Douglas-fir dominated selectively-harvested forest. Specific stewardship objectives include measurable improvements in aquatic and upslope habitat, old growth protection, clean water, and community well being, in addition to producing long-term sustainable timber supplies. MRC and HRC also provide consulting forestry expertise to the private forestry sector in northern California.

Both Mendocino Forest Products (MFP) and the HRC sawmill provide processing and marketing capability for timber-based products in the western USA. One of the core purposes of these entities is to utilize, market, and promote the use of Forest Stewardship Council (FSC) certified timber products. MFP, MRC®, and HRC are all certified to FSC standards and policies due to the high level of standards required by the FSC. FSC was:

- Formed in 1993 by a coalition of environmental organizations including National Resources Defense Council (NRDC), World Wildlife Fund (WWF), National Wildlife Foundation, Wilderness Society, etc.
- Formed with the belief that it was unrealistic to oppose harvesting of all trees for wood products in a world that uses a lot of wood, and where wood alternatives can have significant environmental impacts, and,
- Formed to take on the challenge of creating forest management standards that would constitute exemplary forestland management.

Mendocino Redwood Company

- Publicly committed to the pursuit of FSC certification 6 months after we started.
- Underwent our first review in the summer of 1999.
- We were told we had more work to do, got busy, and dedicated ourselves.
- In late 2000, we became FSC certified (largest California landowner at the time). We have been re-certified twice (once every 5 years, per FSC standards) since 2000.
- We gained a significant education that challenged our old beliefs.
- Obtained validation on our use of exemplary practices - especially in the completion of the landscape planning data collection process, harvest impact calculations, and how to deal with the tanoak issue.

Humboldt Redwood Company

- Began operating in 2008.
- Opened lines of communications to stakeholders and community members to facilitate the transition to the new management philosophy.
- Immediately committed to the same management philosophy that has guided the Mendocino Redwood Company.
- Received FSC Forest Management Certification in December 2010.
- Received FSC Chain of Custody certification at the HRC sawmill on October 21, 2008.

The Mendocino Redwood Company Resource Manager Program (MRCRM)

The market for FSC certified lumber continues to develop and MFP has the existing infrastructure to access this market with timber volumes from MRC® as well as from HRC forestlands. To further expand the availability of certified timber MFP and MRC®, in association with HRC have developed a **Group certification program** designed to forge partnerships with like-minded forest ownerships and resource managers in northern California. MRC® with assistance from HRC will provide the expertise and operational resources for the Mendocino Redwood Company Resource Manager Program (MRCRM). MFP will provide primary sponsorship and administrative support.

Forest management under the Principles and Criteria laid out by the FSC has financial considerations, which can be prohibitive for small forest ownerships. The MRCRM is intended as a means by which Resource Managers, Landowners and their representatives can achieve FSC certification for forestlands at affordable cost.

Introduction

The operating procedures for the MRCRM are laid out in this document, including examples of required documentation. This document is intended as a handbook for Resource Managers, Forest Owners, and Forest Owner Representatives deciding whether to enroll and for those members already enrolled in the program.

Philosophy Statement

As a group, Resource Managers, Forest Owners, and Forest Owner Representatives enrolled in this program manage their forestlands in conformance with the FSC standards and policies and practice the profession of forestry in such a way that strikes a careful balance between environmental and social demands while maintaining economic viability.

Program Background

Forest certification

For several decades, there has been growing concern about the future of forests and the sustainability of harvesting levels. To address these concerns, the Forest Stewardship Council (FSC) created a system of independent forest inspection and certification to assure landowners, consumers, and others that forests certified under this system are well-managed and products from them are harvested in a ecologically, economically, and socially responsible manner.

Forest Stewardship Council (FSC) certification provides a tool to assure landowners that their forests are being well-managed to meet long term ecological, economic and social goals. Landowners, as well as general consumers and others, can feel confident that products from an FSC certified forest are produced without compromising the long-term health and beauty of that forest. Also, FSC Certification provides a marketing label that is increasingly recognized in the market and clearly identifies the product as meeting the standards of certification. Landowners, with MRCRM review and approval can also purchase signs displaying the logo and information to post on their property to demonstrate their commitment to responsible forestry.

Forest Stewardship Council (FSC)

The Forest Stewardship Council (FSC) is an independent, non-profit membership organization. Current membership includes professional foresters, forest product manufacturers, timber companies, environmental groups, and community development organizations. FSC sets standards for well-managed forestry worldwide. FSC then accredits organizations to certify forests according to FSC standards. The goal of the FSC is to promote environmentally responsible, socially beneficial, and economically viable management of the world's forests, by establishing a worldwide standard of recognized and respected Principles of Forest Stewardship.

For more information contact: Forest Stewardship Council U.S., 212 Third Avenue North, Suite 504, Minneapolis, MN 55401; telephone (612) 353-4511.

Resource Manager Certification

Individual certification for small landowners can be cost prohibitive. Group certification aims to overcome cost and other issues limiting small landowner certification by pulling together a number of small forest areas under a single "group manager". The Resource Manager program allows MRC® to act as a source of information and necessary guidance for forest landowners and managers, while providing a certification process that allows each group member to benefit from the economies of scale of being part of a larger group.

Group Certification

The mission of the Group Certification System is to increase and improve access to Forest Stewardship Council certification by providing access to certification for resource managers and the small, private forest ownerships with which they consult.

Group certification is a model of group certification developed to further reduce the costs and technical barriers to Forest Stewardship Council (FSC) certification for forest resource managers and small forest ownerships. The Mendocino Redwood Company Resource Manager Program (MRCRM) operates as such a group system – our certification was awarded after assessment by an accredited certification body with MRC® the “Group Entity”, with MFP and HRC sawmills retaining the option to purchase logs from these group entities. The program enrolls eligible Resource Managers, Forest Owners, or Forest Owner Representatives into the program that are responsible for the management of individual forest ownerships. If a Forest Owner or Forest Owner Representative does not use an enrolled Resource Manager, the MRCRM Program Manager will maintain responsibility for all monitoring and compliance on that individual forest ownership. Enrolled Resource managers are required to monitor FMU’s under their management for compliance to the program and FSC requirements. Resource managers are themselves monitored for compliance by MRCRM staff or their designees. Membership in the MRCRM is free.

Resource Managers, Forest Owners, and Forest Owner Representatives that become members of the MRCRM follow a process of assistance and oversight in partnership with the Group Entities to assure that the FSC standards and policies are met and maintained on their property or properties they manage. This system includes management plan review by the MRCRM Manager, scheduling of field assessments to evaluate harvest designs, and arranging the use of the FSC logo for marketing products from member lands. Members wanting to participate in the MRCRM must commit to meeting FSC standards and policies as well as audit visits by both MRC® staff and certification body staff.

Forest Management under the program is conducted in accordance with the FSC US Forest Management Standard (v1.0). These can be found at <http://www.fscus.org>.

Explanation of certification body’s process

Initially, all applicants for FSC certification undergo an intensive audit to ensure full compliance (including principles, criteria, and indicators) of the relevant FSC standard. This initial certification will address any weaknesses or corrective actions that need to be taken by the applicant to be in full compliance with the FSC standard and will also determine if the applicant can be certified. MRCRM

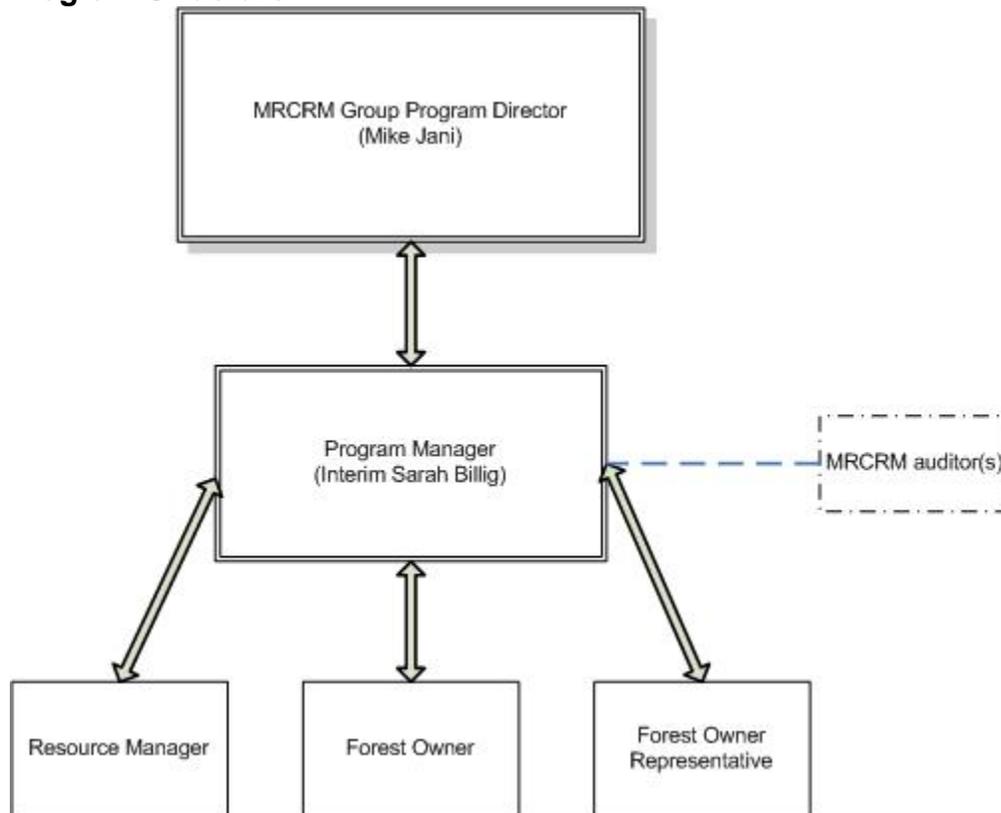
was initially certified in 2007 by Scientific Certification Systems (SCS). Once a certificate is issued, annual surveillance audits will occur to ensure ongoing compliance with the requirements and standards of certification. Annual surveillance audits are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or corrective action requests
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior audit
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

The MRCRM program was re-certified in 2007 by SCS.

Program Operation

Program Structure



Organizational Description

The Mendocino Redwood Company Resource Manager Program represents the areas within Mendocino, Lake, Sonoma, Humboldt, Del Norte and Trinity Counties. The MRCRM is administered by the Program Director who

maintains overall responsibility for establishing policies and assuring conformance with the FSC Principles and Criteria. The MRCRM Program Manager has responsibility for operational direction to group members and internal auditors. Resource Managers are professionals trained in the natural resource sciences that provide management guidance, monitoring capabilities, and technical assistance to forest landowners. Forest Owners are individual landowners that own or control timberland that is managed in accordance with the FSC Principles and Criteria. Forest Owner Representatives are legal representatives of Forest Owners.

MRCRM Program Structure:

Program Director

Mike Jani – President, Humboldt Redwood Company

Program Manager

Sarah Billig – Stewardship Director, Mendocino Redwood Company/Humboldt Redwood Company

MRCRM auditor

Jim Little (contract), others as needed

Procedures of MRCRM staff and training required:

- 1) Ensure overall compliance with FSC Principles and Criteria
Performed by: Program Director
Qualifications: Minimum of 5 years managing FSC-certified programs (e.g. forest management certificates, COC certificates)
- 2) Establishing policies
Performed by: Program Director
Qualifications: Minimum of 5 years managing FSC-certified programs
- 3) Provide operational direction to group members and internal auditors
Performed by: Program Manager
Qualifications: Minimum 3 years managing FSC-certified programs
- 4) Complete internal audits
Performed by: Program Director, Program Manager, MRCRM auditors
Qualifications: Minimum 1 year working in FSC-certified programs, complete a minimum of 1 training audit with MRCRM trained auditor

NOTE: Given the current program structure and staffing, MRCRM can have a maximum of 35 active participants (active means shipping logs in the current year or previous 2 years). An additional 15 inactive participants (not shipping logs in the current year or previous 2 years) may be maintained as well.

Procedures for group members

Resource Managers (RMs) who meet eligibility criteria and who sign a participation agreement are enrolled as participating RMs and will be able to enroll individual forest ownerships or management units under their guidance with prior approval of the MRCRM Manager. Note that all forest owners and forest owner representatives must also sign a participation agreement to enroll.

Individual forest owners or forest owner representatives who wish to participate in the program but who are not affiliated with a certified Resource Manager will be directed to the MRCRM Manager to determine if they are eligible to enroll. The MRCRM Manager will review the management plan of the forest owner to determine if initial eligibility requirements are met, and determine a timeline for on-the-ground review and monitoring of the plan as it is implemented.

FSC trademarks and logo usage

Any promotional usage of the words, “FSC” “Forest Stewardship Council” or utilization of the FSC logo on any documents other than the trip ticket provided by participants in this program require a review by MRCRM staff and approval by MRCRM’s auditor prior to usage. Please submit any requested usage of these terms at least 2 weeks prior to needing to use them to allow time for gaining approval of the usage.

Responsibilities

MRCRM will:

- Provide the administrative services of the program
- Liaise with and pay costs to the certification body (Scientific Certification Systems) necessary to maintain FSC certification for the group.
- Review eligibility for enrollment of Resource Managers, Forest Owners, and Forest Owner Representatives.
- Assess and review management planning documentation of participants and applicants.
- Hold participation agreements with the enrolled membership, Resource Managers, Forest Owners, and Forest Owner Representative.
- Undertake internal auditing on a sample basis of Resource Managers, Forest Owners, and Forest Owner Representatives compliance to program requirements and the FSC US Forest Management Standard (v1.0).
- Provide technical information relating to the program requirements and forest management.
- Identify training opportunities for Participants.

- Provide template documentation and checklists for management planning, planning review, site visit and audits (if needed).
- Produce an annual program report that includes information on total membership and acreage in the program; as well as a list of members' names, harvest plan names, and plan numbers that were harvested in the previous year.
- Provide an explanation of the rights of access to group member properties and records by MRCRM, the certification body, and the FSC.

Resource Managers will:

- Provide detail of their eligibility to operate as a certified Resource Manager, relative to the requirements established by the MRCRM.
- Be committed to the FSC Principles and Criteria.
- Sign a participation agreement which outlines the requirement of the program.
- Provide forest management services to their enrolled forest owners to ensure compliance with the program requirements and with the FSC US Forest Management Standard (v1.0).
- Supply copies of checklists and other management planning documentation of Resource Manager group members to the MRCRM
- Provide on site visits to properties being managed to ensure compliance with the program requirements and with the FSC US Forest Management Standard (v1.0).
- Ensure clients are aware and willing to provide access to their land and MRCRM-related records to FSC auditors and MRCRM staff as requested.
- Ensure clients meet all relevant legal obligations – such as payment of applicable taxes and fees.
- Maintain copies of pertinent documents related to group certification and audits for a minimum of five years and make these accessible to MRCRM and FSC auditors as requested.
- Conform to any Corrective Actions Requests (CARs) issued by MRCRM staff or FSC auditors within the timeline required.
- Provide information relevant to their monitoring of their enrolled forest owners operations and management planning to MRCRM staff (including a list of the plans which were harvested in the previous year as well as any corrective action requests and adaptive learning from ongoing management).
- Understand that when harvests occur on enrolled properties, the name of the member, the name of the harvest plan, as well as the number of the harvest plan will be published in annual monitoring report on the MRC website.

Forest Owners and Forest Owner Representatives will:

- Sign a participation agreement to enroll in the program.
- Be committed to the FSC Principles and Criteria.

- Meet all relevant legal obligations – such as payment of taxes and fees.
- Ensure that management on their land complies with the requirements of the program
- Allow access to their forestland as well as MRCRM-related records for periodic audits by MRCRM representatives and FSC auditors
- Maintain copies of pertinent documents related to group certification and audits for a minimum of five years and make these accessible to MRCRM and FSC auditors as required.
- Conform to any Corrective Actions Requests (CARs) issued by MRCRM staff or FSC auditors within the timeline required.
- Understand that when harvests occur on enrolled properties, the name of the member, the name of the harvest plan, as well as the number of the harvest plan will be published in annual monitoring report on the MRC® website.

Chain of custody requirements

Each member will ensure their logs are tracked and sent appropriately by using the MFP or HRC trip ticket provided for log trucks. This ensures that employees at the sawmill log yard can track the location and certification status of delivered logs and treat them appropriately. All delivered loads must use the trip ticket provided by the MFP or HRC sales/accounting staff.

Eligibility

Resource Managers – Can be any resource manager operating within the area of coverage for the MRCRM. Eligible Resource Managers must demonstrate a commitment to meeting and maintaining the FSC standards and policies in their forest management and must demonstrate a willingness and ability to understand and comply with the program procedures. Further, MRCRM will review applicants' eligibility client references, interview, and site visit to prospective enrolled properties. To become sign a participation agreement and be enrolled in the program, a Resource Manager must demonstrate:

- An understanding and long-term commitment to forest management that is in compliance with the FSC standards and policies.
- An ability to write, administer, and implement management plans that meet the FSC US Forest Management Standard (v1.0).
- An interest in continual improvement in their forest management understanding.
- An understanding of the local, regionally significant forest resources and conditions.

- A willingness to accept feedback and criticism and work with a variety of partners to reach landowner's goals
- A commitment to serving their clients and helping them maintain their certification by complying with all policies and guidelines
- Full compliance with any and all applicable local, state and federal voluntary or regulatory policies and established standards regarding natural resource management, best management practices and the forestry profession.
- Possession of an RPF license.

Forest Owners and Forest Owner Representatives – Can be any forest owner or forest owner representative in MRCRM coverage area. Membership in any landowner associations or other organizations does not prohibit membership. Eligible forest owners or forest owner representatives must demonstrate a commitment to meeting and maintaining the FSC standards and policies in their forest management and must demonstrate a willingness and ability to understand and comply with the MRCRM program policies and procedures.

Enrollment

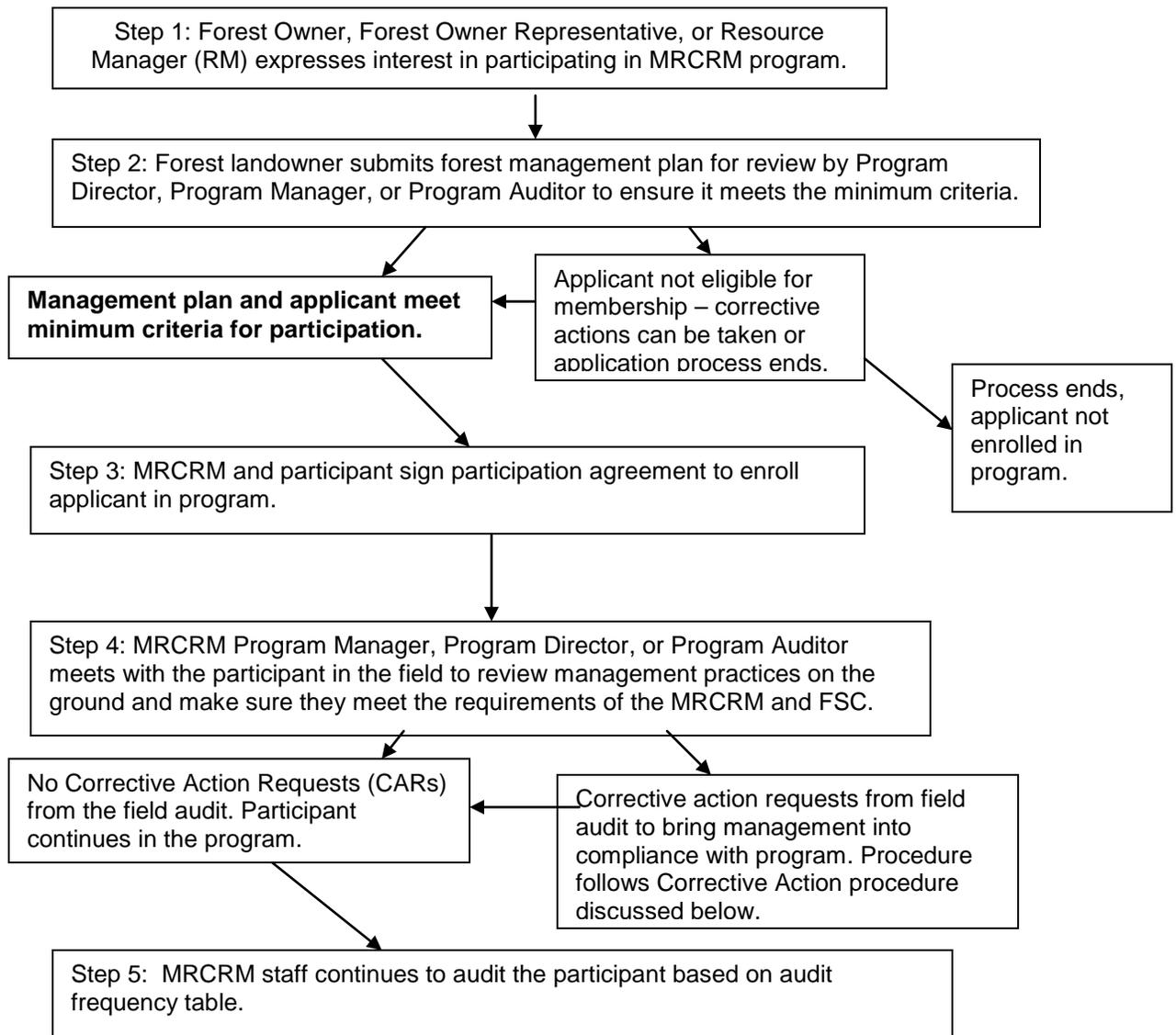
Resource Managers

Resource manager will be enrolled that have:

- 1) Satisfied the eligibility criteria outlined above,
- 2) Signed a participation agreement, and
- 3) One or more FMUs assessed to be in compliance with management planning against the MRCRM/FSC standard (see below).

Group Enrollee Assessment

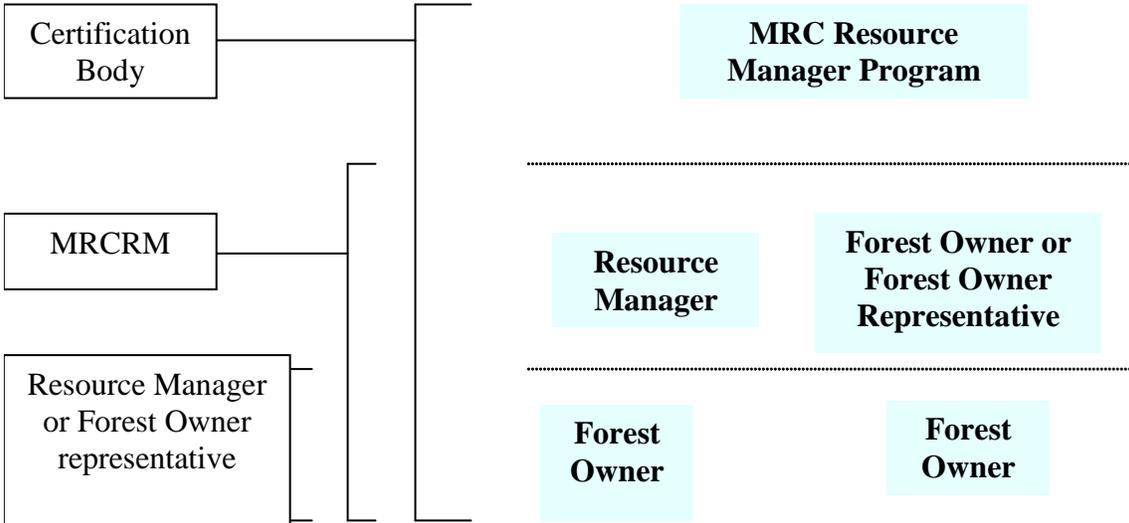
The following assessment steps will be undertaken when assessing a potential participant in the program.



Monitoring / Auditing

Monitoring for compliance is the essential element of the FSC certification program and is conducted through initial and subsequent assessment audits. In the MRCRM, the responsibilities for oversight are defined in the figure below.

MRCRM Monitoring Responsibility



The group certification scheme will be annually audited by the certification body (Scientific Certification Systems [SCS]). This organization will undertake annual audits of the administrative aspects of the program (document records and procedures for MRCRM, the RMs, and Forest Owners or their Representatives) and will undertake sample audits of forest management units enrolled in the program for compliance against the FSC standards and policies. The audits conducted by the certification body and its sample basis will be established in a manner that conforms with FSC auditing requirements.

Audit Frequency

FREQUENCY OF SITE VISITS			
Who is audited	Minimum Frequency	Additional	By whom
MRCRM	Annually	Certification body retains the right to conduct additional audits	Certification body
Resource Manager	One initial plus a minimum of one compliance during the five-year period	MRCRM retains the right to conduct additional audits Certification body will audit a sample of RMs as needed	MRCRM & Certification Body
Forest Owner or Forest Owner Representative	One initial plus a minimum of one compliance during the five-year period	Additional assessment may be made: <ul style="list-style-type: none"> • Pre-operational • During Operations • Post-operational Certification body will audit a sample of enrolled Forest Owners or Forest Owner Representatives annually	MRCRM & Certification Body

Per FSC group certification requirements, MRCRM auditors review the FSC-required minimum number of group members/forest management units (FMUs) every year. The MRCRM is considered a Type I group (mixed responsibilities of members and the MRCRM) and thus has a minimum sample requirement of $x = \text{square root of } y$ ($y = \text{the number of FMUs included in our program}$). MRCRM can further stratify this sample requirement into $x = 0.6 * \text{square root of } y$ for FMUs with less than 1,000 hectares (2,471 acres).

MRCRM will use the same stratification of sets of “like” FMUs as defined by the certification body in their monitoring procedures. MRCRM may more intensively audit its group members than the minimum requirement of FSC to ensure compliance with internal policies.

In general, MRCRM will seek to avoid evaluations of group members that were audited during a given year’s surveillance audit, however; if Corrective Action Requests compliance needs to be assessed or other risk factors occur, MRCRM may audit the same group members to ensure they maintain compliance with internal and FSC standards and policies.

Internal Program monitoring

Group Enrollees

Each group enrollee will receive a review of its management plan as part of the entry assessment. This will be conducted by the MRCRM manager in conjunction with the enrollee and will involve a site visit after the initial management plan review is completed. During this initial assessment the monitoring responsibilities of the enrollee will be defined. These should include the research and data collection needed to monitor, at a minimum, the following indicators:

- a) Yield of all forest products harvested.
- b) Growth rates, regeneration and condition of the forest.
- c) Composition and observed changes in the flora and fauna.
- d) Environmental and social impacts of harvesting and other operations.
- e) Costs, productivity, and efficiency of forest management.

The enrollees are required to report on the defined monitoring objectives to the MRCRM program manager. Results of monitoring will be used in the revision of management plans prior to operational activity and at the end of the five-year cycle. The MRCRM program manager will collate data from all enrollees monitoring programs to produce a summary report that describes issues, objectives and successes in relation to monitoring.

During the initial and ongoing assessments, Corrective Action Requests (CARs) may be raised that identify shortfalls in management planning requirements. These may include the requirement for a management plan or elements of it to be completed or updated. During the five-year period of enrollment each enrollee will receive a minimum of one further site assessment audit by the Program Manager or designee regardless of operational activity. The Program Manager or designee will seek to complete the assessment during pre-operational planning THP or other operational activity planning.

Resource Managers

During the five-year period of enrollment each Resource Manager will be assessed for compliance against program requirements during the initial enrollment process and at a minimum once more, regardless of operational activity. The second assessment will include a review of documentation and record keeping and a site visit to a minimum of one forest management unit in the respective Resource Managers portfolio.

Resource Managers will be required to make periodic visits to each forest management unit under their respective management during periods of operational activity. In addition pre-, during- and post-operational site visits are required and should be conducted using checklists either supplied by MRCRM or

designed by the Resource Manager. All documents should be retained by the Resource Manager and copied to both Forest Owner, Forest Owner Representative (if existing), and the MRC® Resource Manager.

Monitoring Tools

MRCRM staff often use checklists to conduct internal monitoring, such as:

- Management planning / FSC US Forest Management Standard (v1.0)
- Post operational Checklist
- Annual reporting summary

Incorporating Findings and Recommendations

Following the preparation of the Annual Report by the MRCRM Manager, the MFP/HRC log buying team will review the annual report to determine if changes to the program manual are required. Any changes made to the program manual may require changes to the purchase order agreement, the cover letter that accompanies all purchase orders, or, if substantial enough may require communication with all MRCRM group members.

Approved recommendations will be incorporated into this Operations Manual prior to the next scheduled Annual Audit of the MRCRM.

Corrective actions

Both the MRCRM personnel and Resource Managers will generally utilize MRCRM checklists or checklists of their own design when visiting group enrollees. Shortfalls identified should be annotated on checklists and a Corrective Action Request (CAR) raised for each shortfall. Corrective Action Requests (CARs) can be made at anytime a noncompliance is discovered.

If corrective action requests are not addressed within the timeframe given for correction, the CAR will be elevated to a major CAR with a 30 day timeline to rectify the non-compliance. MRCRM staff will assess compliance with CARs by either visiting the site where the CAR occurred or reviewing documentation ensuring compliance.

Availability and Distribution of Monitoring Results

Following the completion or receipt of annual audits and monitoring report for group members, the MRCRM Program Manager will prepare a summary of these reports. Annual summaries will be reported on the MRC/HRC website (www.mrc.com or www.hrcllc.com). Items that may be included in this group report include a list of group certificate members, NTMP/THP numbers, and names of areas harvested under the group certificate in any given year. Also included in the report will be a discussion of any corrective actions noted by

either FSC auditors or MRCRM inspectors during operations (though these will not be tied to individual plans). Additionally, MRCRM is audited annually by its certifying body (SCS) accredited through the FSC. The certifying body annual public report of MRCRM program includes: open corrective action requests, lists of sites visited, stakeholder comments, list of non-SLIMF group members. This public report is available on the FSC website (www.fsc.org).

Disciplinary procedures

To ensure compliance with the FSC standards and policies, it is necessary for participants of the MRCRM to maintain their commitment to their responsibilities as expressed in the participation agreement. MRCRM staff monitors each group member on a semi-annual basis, and will provide Corrective Action Requests (CARs) if there are non-compliances with this policy manual, the FSC Group Standards, or the FSC-US Forest Management Standards (v1.0). If CARs are not addressed within the timeframe given, they will be elevated to major CARs which must be rectified within 90 days. If the CAR is not rectified within 90 days, the group participant will be removed from the group and will no longer be considered FSC-certified. If a member is removed, they are free to re-apply for membership within 30 days and may be accepted if the relevant standards are met and the original non-compliance has been corrected.

Dispute resolution

To avoid conflicts and disciplinary procedures, participants are encouraged to communicate with their RM (if existing) and program manager as much as necessary. Conflicts will largely be avoided if participants ensure their management and operational plans are reviewed and approved by the program manager; treatments are completed in accordance with the approved plan; and the program manager is informed of these activities.

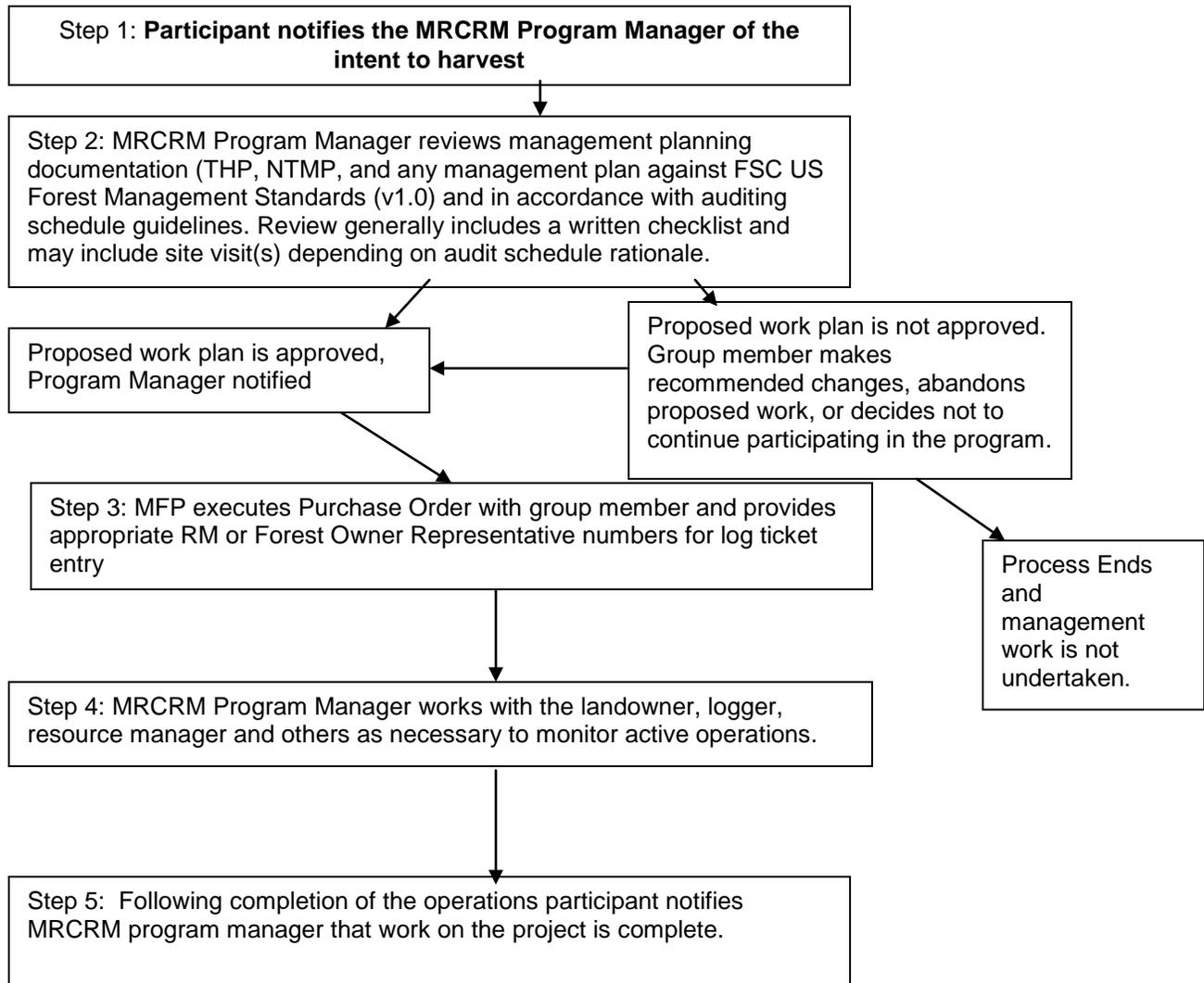
If a conflict arises between a group member and their resource manager or the MRCRM program manager that cannot be resolved, the issue in dispute will be reviewed by the MRCRM program director. If the dispute remains unresolved after review and action by the MRCRM program director – the MRCRM program manager will make a file regarding the dispute and determine with the disputer whether they wish to or can remain in the program. If disputes arise related to interpretation of any FSC standard or policy, both the MRCRM and the participant will bring the dispute to our certification body, Scientific Certification Systems, and follow their procedure, entitled, “Complaint and Appeal Investigation Procedures.” A copy of the written procedure is available via the SCS website or from MRCRM staff upon request.

Dis-enrollment (destitution)

Participation in the program is voluntary and as such enrolled members may opt out at anytime by informing the MRCRM Program Manager in a written letter. However, the FSC standard demands that participants demonstrate long term commitment to certified management. Participants that opt out may not be eligible to rejoin or may be given a probationary period for re-entry, to be determined by the MRCRM Director.

Operational Activity Management

Close supervision of operational activity is essential in ensuring compliance with the FSC standard. The process by which this occurs is outlined below.



Chain of Custody

Upon execution of the Purchase Order between MFP and the group participant, the MRCRM certificate number shall be provided and entered on each load ticket leaving the property. This shall be entered on each scale ticket at the time of scaling at the MFP or HRC milling facility. These logs will be segregated and milled separately from non-FSC certified materials which may be delivered to the MFP or HRC mill.

Policy Guidelines

Certification Compliance and Performance Evaluation Protocol

Stage in Forest Management Process	Conducted By	Form(s)	Guidance
During the Management Plan Development Process	Resource Manager Or MRCRM Program Manager or designee	Management plan and associated Timber Harvest Plan or Non-Industrial Timber Harvest Plan	At least one site visit will be conducted by the Resource Manager or MRCRM Program Manager (or designee) and the plans shall be written to adhere to FSC Regional Guidelines
Before Forest Management Activities	RM (with copies submitted to MRCRM Program Manager) OR MRCRM Program Manager or designee	Management Plan Review Checklist; Resource Manager or Forest Owner Representative will hold pre-harvest site visit with assigned Timber Operator (documentation provided to MRCRM program manager as needed)	MRCRM Program Manager or designee may conduct a site visit before active operations if the site has not been visited in the past 2 years or the activity includes commercial timber harvesting, road construction, rare species or habitats, other unique situations.
During Forest Management Activities			Resource Managers or Forest Owners or Forest Owner Representatives will monitor operational activity sufficient to ensure operations proceed according to planned activity

			and in accordance with the FSC standard. Non-commercial activities will be monitored as necessary.
After Forest Management Activities	RM Or MRCRM Program Manager or designee		One site visit may be conducted following the completion of site disturbing activities by either the RM or MRCRM Program Manager, or designee. Site disturbing activities include commercial timber harvesting, road construction, rare species or habitats, other unique situations.
Annual Reviews	MRCRM Program Manager	Annual Compliance Review	The MRCRM Program Manager will assure that all properties are visited by MRCRM Program Manager, or their designee at least once during the five-year certification period and a minimum twice if operational activity occurs in that period.

Contract and Service Provider Policies

To be eligible to participate in the MRCRM, forest owners or their representatives must either contract with an enrolled RM or work directly with the MRCRM Program Manager. All service providers must demonstrate an understanding of the FSC US Forest Management Standard (v1.0) and the MRCRM policies and operations as well as show a willingness to comply with all requirements.

Potential service providers include private forestry consultants, public agency foresters, and other public or private natural resource professionals. MRCRM will make all manuals, documents, and materials regarding this program available to service providers upon request.

Appendix 1 – Completion of operations checklist

Questions to be answered during post-harvest review:

- 1) What is the stand condition (does the stocking meet what was prescribed in the NTMP or management plan, how much stand damage occurred)?
- 2) Was erosion control implemented as proposed (review a minimum of 5 random road points)?
- 3) Are there any future plans for vegetation management or planting?
- 4) Were there any special concern areas retained or harvested with different prescriptions (e.g. stream zones, retention of biological legacies, endangered species buffers, etc)?
- 5) Were there any responses to the required notice of operations? If so, how did you address them?
- 6) Are there any sites of tribal significance protected in the treated area? Was there any tribal involvement or interest during or prior to operations?
- 7) Were there other specific mitigations prescribed in the NTMP that need to be addressed?
- 8) Were there any notices of violation on this operation?
- 9) Did the volume removed fall within the allowable harvest levels as identified in the NTMP or management plan?
- 10) Have there been any environmental or landscape changes (natural or man caused) that would trigger amendments to the NTMP or management plan?
- 11) Have there been any regulatory changes that should be incorporated into the NTMP or management plan?
- 12) Does this operation complete harvesting (or management) in this unit? If so, has the site been properly closed?
- 13) Were the forest products sold under FSC certification properly documented for Chain of Custody?