

FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY SURVEILLANCE EVALUATION REPORT

Mendocino Redwood Company Resource Manager Certificate

SCS-FM/COC-00001G

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CERTIFIED	EXPIRATION
15 September 2017	14 September 2022

DATE OF FIELD EVALUATION
23-26 July 2019
DATE OF LAST UPDATE
12 November 2019

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Foreword

Cycle in annual surveillance evaluations				
<input type="checkbox"/> 1 st annual evaluation	<input checked="" type="checkbox"/> 2 nd annual evaluation	<input type="checkbox"/> 3 rd annual evaluation	<input type="checkbox"/> 4 th annual evaluation	<input type="checkbox"/> Other (<i>expansion of scope, Major CAR audit, special audit, etc.</i>):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
Mendocino Redwood Company Resource Management ("MRCRM")				

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual evaluations to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database <http://info.fsc.org/>.

Pursuant to FSC and SCS guidelines, annual / surveillance evaluations are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope evaluation would be prohibitive and it is not mandated by FSC evaluation protocols. Rather, annual evaluations are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual evaluation);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; and
- 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 evaluation.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (<http://info.fsc.org/>) no less than 90 days after completion of the on-site evaluation. Section B contains more detailed results and information for required FSC record-keeping or the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Stefan A. Bergmann	Auditor role:	Lead Auditor
Qualifications:	Mr. Bergmann has been in the forestry and wood products field for nearly 20 years, working across the US in forest policy, landowner extension, executive leadership, and forest certification. Prior to joining SCS in July 2017, he worked for Rainforest Alliance, overseeing the Forest Stewardship Council® (FSC®) Forest Management auditing program in the US. He has successfully completed FSC Forest Management Lead Auditor training, ISO 9001 Lead Auditor training, and is qualified to be a team SFI Auditor. He has served as lead and team auditors on numerous FSC FM audits. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, Corvallis, Oregon, USA. He also recently completed an MBA at the University of California Davis.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	3
B. Number of auditors participating in on-site evaluation:	1
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up:	2
E. Total number of person days used in evaluation:	5

1.3 Standards Used

All standards used are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US V1.0, approved 8 July 2010
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V7-0
	<input checked="" type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Date: 23 July 2019	
FMU / location / sites visited	Activities / notes
MRC Office, Ukiah	Opening Meeting: Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, and final site selection
Site 1: Bear Flat FMU	<p>Located in Sonoma County, this 375-ac FMU is managed for multiple use under an NTMP. Landowner's objectives are timber production, personal and paid camping, wildlife viewing, mushroom hunting, among others. The owner focuses on uneven management of redwood, Douglas-fir, and oak. Madrone was dominate in areas; while not a commercial species, the landowner promotes madrone for its aesthetic qualities, association with mushrooms, and as a fuel break. Signs of SOD were evident, as were exotic invasive plants. The landowner has protected a historic archeological site with an equipment exclusion zone, which was verified. Some lithic scatter has been found, but no prehistoric archeological sites. Several water tanks were observed, which provide gravity-fed water for use around outbuildings and camp sites; the water is also provided to hydrants for controlled burning and fire protection. Girdled fir trees were observed across the property, creating wildlife snags. No NSO have been identified on the property, although the landowner calls 6 times per year (mostly bringing in barred owls). He is in negotiation with a telecommunications company installation of a cell phone tower, which would diversify the revenue from the property. Oak grassland rehabilitation at hilltop.</p> <p>Interviewed landowner. He is an active leader in the small woodland owner community in the county. He demonstrated awareness of the FSC FM standard, including its provisions for protection of archeological sites, riparian areas and water quality, supporting efforts for enhancing public understanding of forestry, consulting with affected stakeholders, and others. The landowner described the work he has done to diversify the revenue sources on the property. He also described his interested in either donating or selling trees that would be used for a fisheries restoration project outside the FMU. He confirmed that redwood seedlings planted on the property are from a nursery in Oregon that procures seed from the same provenance. On harvested sites, the landowner aims to leave 3 to 4 trees per acre for legacy or</p>

<p>Site 1 (Cont.)</p>	<p>wildlife); one such tree was observed with “Reserve Tree – Do Not Cut” signage.</p> <p>Field inspections of Bear Creek Road, a haul road following Bear Creek (Class 2 stream for lower end), was in fair condition. It was well-armored with rocky/sandy substrate and, although it lacked an interior ditch for much of its length, there was little evidence of erosion. Two rock crossings for small ephemeral springs (both dry at the time) were observed on the road; there was evidence of pooling on the uphill side, but it was contained and there was little risk to sedimentation to Bear Creek. A water bar on a side road uphill of Bear Creek Road had been compromised during winter precipitation, and some rilling of the side road and Bear Creek Road was observed as a result. In addition, below a culverted crossing of an ephemeral stream, also at Bear Creek Road, there was evidence of minor siltation that appeared to be caused by insufficient armoring of the downstream side of the culvert. The ephemeral stream flows into Bear Creek, which then feeds Miller Creek off the property, which is Class 1 stream with anadromous fish. See OBS 2019.1.</p>
<p>Date: 24 July 2019</p>	
<p>FMU / location / sites visited</p>	<p>Activities / notes</p>
<p>Site 2: Families Blue Lakes FMU, south block</p>	<p>This 3,234-acre FMU is the northernmost member of the MRCRM group; it’s located in Humboldt County. Although it operates under an NTMP, for FSC sampling purposes, it’s considered a ‘medium’ FMU. The FMU is divided into north and south blocks; the auditor targeted the 1,200-ac south block because of the presence of logging activity. The FMU is managed by a local forestry consulting company on behalf of several related families.</p> <p>LTO owner/operator was interviewed and in-woods workers observed operating in THP 1-99-NTMP014, Unit 65. The forestry company provides load tickets instead of using the ones provided by MRCRM; a completed ticket was reviewed and found to be in conformance with the FSC trademark standard and included the appropriate claim. Logs ends were branded.</p> <p>The operation has yarder and cat crews. Interview demonstrated an understanding of the harvest prescription, COC tracking system, in-woods logging safety, and training. Spill kits, fire extinguishers, First-Aid kits, and PPE were found onsite. The landing also had a well-stocked firebox and water. In-woods workers were observed to be operating in a safe manner.</p> <p>Harvests in the block are all redwood and Douglas-fir selection cuts. All trees for harvest are marked by the consulting forestry company, and boundaries of each unit are flagged, as are riparian and equipment exclusion zones; property lines near sales are</p>

<p>Site 2 (Cont).</p>	<p>flagged in red, and trees on the line are blazed and painted. Slash is not burned; it is either placed in trails, scattered in units, or chipped. In one unit, the owning family has chosen to pay extra and have slash chipped on the landing and distributed on exposed soil to minimize erosion. Review of a several Class 2 streams on the FMU demonstrated conformance with requirements of state law and the FSC standard for riparian area and water quality protection; no equipment is allowed in RMZs, which are flagged and with 80% retention.</p> <p>Roads on the FMU were in good condition. Most were graveled with crowning to shed precipitation, ditched, and with rolling dips; unused temporary roads and logging trails had water bars. Evidence of seeding of logging trails was observed; verified that a weed-free seed mix from the state was used. No evidence of erosion or sedimentation associated with the roads or logging trails.</p> <p>Historic archeological sites on the south block include railroads and quarries. The forester stated that they are buffered, and no equipment is allowed. The landowners do not allow public access, and there have been few issues with trespass. The families annually have a tour for school kids.</p>
<p>Date: 25 July 2019</p>	
<p>Site 3: Parker 10 Mile Ranch FMU</p>	<p>This 2,015-ac property in Mendocino County is family-owned but managed by a forester who lives onsite. The FMU is primarily managed for timber production; however, lowland pastures and hay fields, as well as and barns, are leased to a local cattle rancher. Additionally, several trails and a camp are leased to a local horseback trail-riding company. Ten Mile River flows through the bottomland pastures; there is an approximately 50-ft buffer between the grazing and the water. The river contains anadromous fish. There have been discussions with Trout Unlimited to create ponds for fish habitat in the floodplain along Ten Mile River.</p> <p>The FMU is managed under an NTMP. It's divided into 10 units, and re-entry periods are about 10 to 12 years. The NTMP was written in 1992, and they are about one-half way through the forest's 3rd rotation. In addition to being FSC-certified, the FMU is a certified Tree Farm and has been recognized as a Model Forest by the Forest Stewards Guild.</p> <p>Manchester Grove is an old homestead site that was later used by the family as a camp for fishing and hunting. The camp is in a 10-acre stand of Type 2 old growth that is in a conservation easement held by The Nature Conservancy and established in 2016. The stand has been excluded from the NTMP. Today, the camp is used</p>

<p>Site 3 (Cont.)</p>	<p>by horse riders. A recent selection cut abutting the old growth stand was completed with flagging evident at the stand boundary. An osprey nest had been found in the vicinity, which received a 100-ft no-cut buffer. Property boundaries are blazed; operations near boundaries are flagged.</p> <p>Lyme Timber owns and maintains much of the length of the main haul road in the FMU. The FME pays a road use fee. Until recently, the FMU was open to the public; however, an incident involving a motor vehicle accident occurred last year, and as a result the landowner has decided to close the road to the public. Lyme Timber has installed a substantial locked metal gate at the entrance to the property, which is shared with the FME.</p> <p>Manchester Unit 4, a harvest that occurred last May and June, was reviewed. The 160-ac site is heavy to redwood, and the prescription was an uneven-age selection harvest, with a focus on providing appropriate spacing for the residual trees. It was a 3rd entry, with 1.1MMBF removed. Some of the larger overstory trees were removed. Cable-yarded operation. Slash was present on skid tails; the forester does not burn piles. 10 to 15 Douglas-fir in the unit had been girdled after the operation to create snags, and pre-existing wildlife trees were retained. Water bars were evident on skid trails. WLPZ was flagged as no-equipment exclusion. At a culverted crossing on a steep slope, the forester had recently added a long downspout extension to reduce the chance of erosion.</p> <p>In conservation easement, forester had girdled a large (20-in DBH) Douglas-fir. The tree had been open grown, as evident from its large limbs. The snag was significant, towering over the rest of the stand. Legacy trees have been identified, tagged, and reserved from harvest.</p> <p>Invasives are not a significant issue on the property, although pampas grass is present in open areas until it is shaded out by trees. No herbicides are used on the FMU.</p>
<p>Site 4: Jackson Demonstration State Forest FMU</p>	<p>This 48,652-ac FMU is the only member of the group classified as 'large' for sampling purposes; it is non-SLIMF. Camp 8, #2 THP is an active logging operation. It is being conducted near a public campground that is located along the North Forth of the Noyo River. Prescription for this 300-ac unit is a selection cut to reduce the stand to 160-ft² BA. Observed yarding operation; workers were wearing appropriate PPE and operating in a safe manner. Archeological sites include an old train trestle, which is in the WLPZ and protected from harvest. There is also lithic scatter, but no prehistoric archeological sites. The unit contains an old, unoccupied NSO nest, which doesn't need protection.</p>

	<p>As part of the COC tracking system for JDSF, harvest contracts require that LTOs use brands on logs. However, no such brands were observed on logs loaded onto a log truck during the audit, nor were any other identifying marks other than a trip ticket stapled to one log. The JDSF administrator of the active sale explained that all brand hammers have been lost and therefore no hammers were issued to the LTO; not issuing brand hammers conflicts with the requirements in the harvest contract. See Minor CAR 2019.2.</p> <p>Road 308 along the Noyo River is in good condition with gravel substrate that's crowned to shed precipitation, ditched, and with wide shoulders. It is a state road used for forest work and access to a rustic public campground and meets state road requirements. Bridge crossing installed 3 years ago at a cost of \$300K because it was constructed to state standards. No evidence of any erosion at the bridge, which crosses the Noyo River, a Class 1 stream that contains salmonids. Observed culverted culvert that was recently replaced along the main haul road. Metal culvert was removed, and an 18-in double-walled black plastic culvert installed for the Class 3 stream; each culvert end is well armored with large rock. There were several other culverts that has been installed along the main road as part of the THP.</p> <p>Bear Gulch (THP 2-18151) is a planned harvest of 200-300 acres. It has been sold and harvesting will commence soon. It includes one VR unit, group selection cut of redwood and Douglas-fir, and 4 study blocks (JDSF has a significant research program). Class 2 and 3 streams in THP will receive appropriate RMZ protections. Class 1 stream in THP will include a 50-100 foot no cut RMZ. Bear Gulch Road travels through the THP.</p> <p>Parlan THP (THP 17) is a planned harvest of 500-700 acres. Expected to be sold in 2020. Will be selection cut (possibly some group selection). Current stand is 60% redwood and 40% fir. Prescription will reduce BA to 160 sq-ft. Much of fir is infected with fungi (often expressed through visible conks). Most of infected trees will be felled, and unmerchantable infected portions of trees will be left onsite for wildlife and potentially for public firewood cutting. Selection harvest divided into 2 units. It has not yet been approved. Harvest will occur next year. An old bridge next to Parlan Campground will be replaced next June.</p> <p>Gulch THP (THP 23) is another harvest that has been sold. Harvesting will commence in about 1 month. Several culverts on the 359 Road, which is in the area, will be replaced with the support of grants.</p>
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Date: 26 July 2019	
FME Office in Ukiah	Closing Meeting: Reviewed preliminary findings (potential non-conformities and observations) & discuss next steps

2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME's conformance to FSC standards and policies. Evaluation methods include reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, interviews, stakeholder comments, and reviewed documents and records. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3. Changes in Management Practices

- There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.
- Significant changes occurred since the last evaluation that may affect the FME's conformance to FSC standards and policies (*describe*):

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

Major CARs: Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME's response to the CAR within the stipulated time frame.

Minor CARs: These are corrective action requests in response to minor nonconformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Most Minor CARs are the result of nonconformance at the indicator-level. Corrective actions must be closed out within a specified time period of award of the certificate.

Observations: These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further

refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation	1 st Annual Evaluation	2 nd Annual Evaluation	3 rd Annual Evaluation	4 th Annual Evaluation
No findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P1			CAR 2019.3		
P2			CAR 2019.2		
P3					
P4		OBS 2018.3			
P5					
P6	OBS 2017.1 OBS 2017.2	CAR 2018.1 OBS 2018.2	OBS 2019.1		
P7					
P8					
P9		OBS 2018.5			
P10					
COC for FM		OBS 2018.4			
Trademark	CAR 2017.3				
Group					
Other					

4.3 Existing Corrective Action Requests and Observations

Finding Number: 2018.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard, Indicator 6.7.a.
Non-Conformity (or Background/ Justification in the case of Observations): The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills. This includes but is not limited to: spill kits, plans, and knowledge of qualified personnel to call on in an event of a hazardous spill.	
Corrective Action Request (or Observation): During 2017 re-certification audit, no evidence of spills were noted on any harvest sites or log landings visited. Both of the active operations inspected during the audit were clean of spills, multiple spill kits were available at each active site, and staff interviewed were familiar with hazardous spill procedures. However, logging operators and Registered Professional Foresters (RPFs) interviewed during the course of the audit did not know reportable spill amounts.	

<p>Interviewees indicated they would be able to quickly find that information. Uncertainty around this subject area merited an observation (see OBS 2017.1).</p> <p>In response to the finding, the FME sent an email on 15 May 2018 providing guidance to all group participants on the requirements for spill reporting procedures under state and federal law. A copy of the email was reviewed by the auditor during the 2018 annual surveillance audit, and interviewed group members confirmed receipt of this communication.</p> <p>The FME has stated that it also reinforced these requirements with those group members visited in person by providing the document, “California Hazardous Materials Spill / Release Notification Guidance,” published by the California Governor’s Office of Emergency Services (dated February 2014). A copy of this guidance was reviewed by the auditor.</p> <p>During the 2018 annual surveillance audit, at Site 23 (one of the two active harvests evaluated) the landing crew did not have a spill kit onsite. Since an issue related to preparations for hazardous spill responses has occurred for a second year in a row, the 2017 finding has been upgraded to a Minor CAR.</p>	
FME response (including any evidence submitted)	<p>The group manager continued to communicate the importance of having spill kits onsite during individual audits in 2019. Unfortunately, no active sites were audited during the 2019 internal audits since the rains lasted late into the year in 2019. Group manager sent an emails on 4/29/19 and 7/3/19 to remind participants of this expectation.</p>
SCS review	<p>Auditor reviewed an email dated 29 April 2019 from group manager to group members requesting information in preparation for the 2019 FSC audit. The email contained a reminder to ensure that employees and contractors “have and know how to use appropriate spill remediation tools.” The email also contained language from a previous email sent on 15 May 2018 to members explaining the state-required spill reporting amounts and procedures. A second email dated 3 July 2019 was also reviewed; the message was specifically about requirements for spill kits and a heads up that the auditor would be looking for both spill kits and evidence of training during the FSC audit.</p> <p>Spill kits were observed at the two active sites evaluated during the 2019 audit. Additionally, interviews with forest workers confirmed knowledge about how to use the kits.</p>
Status of CAR	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2018.2
<i>Select one:</i> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation
FMU CAR/OBS issued to (when more than one FMU):

Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS COC Indicators for FMEs, Indicator 2.3 <i>(Note: In 2017 and 2018, this finding was issued against Indicators 6.1 and 6.2 in FSC-STD-40-004. The FSC Indicator for the finding has been updated to be consistent with the current standard.)</i>
<p>Non-Conformity (or Background/ Justification in the case of Observations): During 2017 re-certification audit, inspection of sales contracts used by Jackson Demonstration State Forest did not include FSC certificate identification information as related to log load tickets. However, this was already identified during MRCRM internal audit for 2016-2017 and corrective actions were already being addressed. Thus it was graded as an Observation (see OBS 2017.2). Sales identification information did allow accurate tracking of raw logs via log load tickets and contract documentation in organization databases.</p> <p>In response, FME itself issued Jackson Demonstration State Forest a CAR. The expectation is that they will provide a letter referencing all the contracts that were FSC certified identifying them as such to the purchasers no late than 31 July 2018.</p> <p>Since the 2018 audit was conducted less than 12 months from the 2017 re-certification when the OBS was issued, plus the fact that the FME is in the process of addressing this issue, the finding will remain as an open observation.</p>	
<p>Corrective Action Request (or Observation): FME shall ensure that all sales and delivery documents issued for outputs sold with all of the information listed under 6.1 including cases that if separate delivery documents are issued, information sufficient to link the sale and related delivery documentation to each other. Also the same information as required in clause 6.1.1 shall be included in the related delivery documentation, if the sales documentation (or copy of it) is not included with the shipment of the product.</p>	
FME response (including any evidence submitted)	Group manager closed this internal CAR as a result of receiving documentation of correction of sales documents which were incorrect.

SCS review	<p>A letter from JDSF to MRC (which in this case was the purchaser) dated 27 September 2018 was reviewed. The letter stated that the timber sales in question (South Fork Caspar Matrix Timber Sale, Wonder Crossing Timber Sale, and Camp 8 #2 Timber Sale) are FSC certified and sold at FSC 100% under certificate code SCS-FM/COC-00001G. A copy of the letter was also provided to the mill.</p> <p>A sampled timber sale contract for JDSF (Wonder Crossing Timber Sale; contract #8CA03601) was reviewed and found to include the FSC claim and certificate code. Additionally, during the 2019 FSC field evaluation of the active site on JDSF, a completed load ticket was reviewed on a log load; the ticket included the FSC 100% claim and FM/COC certificate code.</p>
Status of CAR	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2018.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard, 4.2.b
Non-Conformity (or Background/ Justification in the case of Observations): At one of the two active harvests evaluated during the 2018 audit, auditor observations and interviews with employees on the landing (Site 25) and with sub-contracted fallers (Site 23) revealed inadequate use of PPE. Of the two fallers, neither were wearing chaps and one was not wearing eye protection. Of the three LTO employees working on the landing, none were wearing chaps (including the landing operator who was bucking logs), none were wearing eye protection, and only one was wearing ear plugs. One employee stated that PPE is made available to employees, but unless an employee is new to the job then none are required to wear it. The one who was bucking was new to the logging industry, having only been there for one month—he wore no PPE except a hardhat. At the other active harvest evaluated this year (Site 2), the three employees who were working on the landing and at the yarding site all wore appropriate PPE, suggesting that the issue is limited in scope and thereby justifying an Observation.	
Corrective Action Request (or Observation): The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.	

FME response (including any evidence submitted)	Continued reminders to participants that contract loggers need to follow OSHA requirements. Group manager would provide a corrective action if unsafe or inappropriate PPE usage occurred during audit, but has yet to observe during individual audits. This was also noted in the 4/29/19 email to participants.
SCS review	Auditor reviewed an email dated 29 April 2019 from group manager to group members requesting information in preparation for the 2019 FSC audit, verifying written communication of this requirement. The email contained a reminder to ensure that employees and contractors wear proper PPE. At both active sites evaluated during the 2019 audit, all forest workers observed were wearing appropriate PPE and conveyed knowledge of PPE requirements.
Status of CAR	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2018.4	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS COC Indicators for FMEs, 2.3
Non-Conformity (or Background/ Justification in the case of Observations): Tickets that accompany each load of logs is an essential part of the FME’s system for passing along the FSC certification claim at the forest gate. Samples of both completed and incomplete trip ticket did not correctly state “FSC 100%” in the claim.	
Corrective Action Request (or Observation): The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the clear indication of the FSC claim for each product item or the total products as “FSC 100%” for products from FSC 100% product groups.	
FME response (including any evidence submitted)	This issue was corrected immediately after the audit with MRC log resources manager and log clerk. We have made every attempt to remove incorrect tickets from the chain and to train appropriate staff on the correct tickets.
SCS review	Auditor reviewed completed load tickets for the active sites evaluated during the 2019 audit, verifying that both contained the FSC 100% claim. In these cases, the members themselves provide load tickets to the LTO and do not use those provided by MRCRM. Auditor also reviewed new-produced load tickets that are provided to members by MRCRM who do not use their own tickets. The new tickets include the FSC 100% claim.

Status of CAR	<input checked="" type="checkbox"/> Closed
	<input type="checkbox"/> Upgraded to Major
	<input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2018.5	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-STD-30-005 V1-1, 9.2
Non-Conformity (or Background/ Justification in the case of Observations): COC procedures as described in <i>Operations Manual – Mendocino Redwood Company Resource Manager</i> (dated July 2017) state on page 12: “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.” Examination of harvest information for the group member Jackson State Demonstration Forest (JSDF) revealed that the member uses its own trip ticket, not one provided by MFP or HRC.	
Corrective Action Request (or <i>Observation</i>): For the purpose of ensuring that non-certified material is not being mixed with FSC-certified material, FSC products shall only be sold according to a sales protocol agreed by the Group members and the Group entity.	
FME response (including any evidence submitted)	Operations manual was updated in May 2019, including the version on the website.
SCS review	Auditor reviewed “OPERATIONS MANUAL – MENDOCINO REDWOOD COMPANY RESOURCE MANAGER” (revised May 2019) and verified that edits were made to page 12 to allow members to use their own tickets. The manual now states: “All delivered loads must use the trip ticket provided by the MFP or HRC sales/accounting staff or a ticket with the correct certificate code and claim.” Auditor verified that the updated manual is on FME’s website.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.4 New Corrective Action Requests and Observations

Finding Number: 2019.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to: Bear Creek FMU	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard, Indicator 6.5.d
Non-Conformity (or Background/ Justification in the case of Observations): Minor erosion associated with roading was observed on Bear Creek FMU. A water bar on a side road uphill of Bear Creek Road had been compromised during winter precipitation, and some rilling of the side road and Bear Creek Road was observed as a result. In addition, below a culverted crossing of an ephemeral stream, also at Bear Creek Road, there was evidence of minor siltation that appeared to be caused by insufficient armoring of the downstream side of the culvert. The ephemeral stream flows into Bear Creek, which then feeds a Class 1 stream with anadromous fish.	
Corrective Action Request (or Observation): The transportation system, including design of temporary and permanent roads, trails, and water crossings, shall be designed, constructed, and maintained to reduce short and long-term environmental impacts. This shall include minimizing erosion and sediment discharge to streams.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2019.2	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to: JDSF FMU	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator	SCS COC Indicators for FMEs, Indicator 2.1

Non-Conformity (or Background/ Justification in the case of Observations):	
As part of the COC tracking system for JDSF, harvest contracts require that LTOs use brands on logs. However, no such brands were observed on logs loaded onto a log truck during the audit, nor were any other identifying marks other than a trip ticket stapled to one log. A sampled timber sale contract for JDSF (Wonder Crossing Timber Sale; contract #8CA03601) was reviewed; Exhibit A (Scope of Work), Item 9, states that the LTO “shall identify all timber by making a mark with a brand provided by the STATE.” The JDSF administrator of the active sale evaluated during the audit explained that all brand hammers have been lost and therefore no hammers were issued to the LTO; not issuing brand hammers conflicts with the requirements in the harvest contract.	
Corrective Action Request (or Observation):	
Products from the certified forest area shall be identifiable as certified at the forest gate(s). This shall include implementing COC procedures that are required in the harvest contract.	
FME response (including any evidence submitted)	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2019.3	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to: MRCRM and JDSF FMU	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC Trademark Standard, Indicator 1.4
Non-Conformity (or Background/ Justification in the case of Observations):	
The current MRCRM load tickets, which are provided to members who don’t have their own tickets, incorrectly use the copyright (©) sign for the FSC acronym, instead of the federal trademark registration (®) sign. Additionally, the current load tickets for the group member JDSF state “FSC 100%” with the FSC acronym missing the federal trademark registration (®) sign.	
Corrective Action Request (or Observation):	
The symbol ® shall be added to ‘FSC’ at the first or most prominent use in any text, including on load tickets that contain the FSC claim of 100%.	
FME response (including any evidence submitted)	
SCS review	

Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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5. Stakeholder Comments

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the standard, and the nature of the interaction between the FME and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used.

5.1 Stakeholder Groups Consulted

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, and additional stakeholder contacts from other sources. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

<input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.</i>	
Stakeholder Comment	SCS Response

MRCRM did a great job on the recent sale on our property. If we had a question, we could reach out and they would be very prompt and efficient in responding. The only pain point was that one of the mills caused a backup. However, the company’s wood buyer did a lot of work to ensure that the logger felt taken care of. This was a real testament to the company’s professionalism.	Duly noted.
Over the course of the audit, numerous positive comments were received about MRCRM from contractors. The staff at MRCRM are viewed as excellent—open minded, good communicators, and with a positive customer service orientation.	These comments were consistent with the auditor’s experience in working with the FME during the audit. No negative comments were received, and no issues triggering subsequent investigation during the evaluation were received.

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: MRCRM provides an opportunity for small landowners to be FSC certified. Through its internal monitoring and accessibility, the company provides added value to its group members. Review of internal monitoring and other records, interviews with stakeholders, and field observations demonstrate that the FME is in compliance with the FSC standard.	

7. Annual Data Update

<input type="checkbox"/> No changes since previous evaluation.	
<input type="checkbox"/> Information in the following sections has changed since previous evaluation.	
<input type="checkbox"/> Name and Contact Information <input type="checkbox"/> FSC Sales Information <input type="checkbox"/> Scope of Certificate <input type="checkbox"/> Non-SLIMF FMUs <input checked="" type="checkbox"/> Social Information	<input checked="" type="checkbox"/> Pesticide and Other Chemical Use <input type="checkbox"/> Production Forests <input type="checkbox"/> FSC Product Classification <input type="checkbox"/> Conservation & High Conservation Value Areas <input type="checkbox"/> Areas Outside of the Scope of Certification

Name and Contact Information

Organization name	Mendocino Redwood Resource Manager Certification Program		
Contact person	Sarah Billig		
Address	Mendocino Redwood	Telephone	707-463-5125
	Company	Fax	707-463-5530
	P.O. Box 996	e-mail	sbillig@mendoco.com
	Ukiah, California 95482	Website	http://www.mrc.com/

FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson			
Address	Telephone		
	Fax		
	e-mail		
	Website		

Scope of Certificate

Certificate type	<input type="checkbox"/> Single FMU		<input type="checkbox"/> Multiple FMU	
	<input checked="" type="checkbox"/> Group (contains SLIMF & non-SLIMF)			
SLIMF if applicable	<input type="checkbox"/> Small SLIMF certificate		<input type="checkbox"/> Low intensity SLIMF certificate	
	<input checked="" type="checkbox"/> Group SLIMF certificate (contains SLIMF & non-SLIMF)			
# Group Members (if applicable)	21			
Number of FMU's in scope of certificate	26			
Geographic location of non-SLIMF FMU(s)	Latitude & Longitude: various			
Forest zone	<input type="checkbox"/> Boreal		<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical		<input type="checkbox"/> Tropical	
Total forest area in scope of certificate which is: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
privately managed	44,499 ac			
state managed	48,652 ac			
community managed	0			
Number of FMUs in scope that are:				
less than 100 ha in area	9	100 - 1000 ha in area	13	
1000 - 10 000 ha in area	3	more than 10 000 ha in area	1	
Total forest area in scope of certificate which is included in FMUs that: Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
are less than 100 ha in area	907 ac			
are between 100 ha and 1000 ha in area	17,309 ac			
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0			
Division of FMUs into manageable units:				
Each group participant represents one FMU. Most properties are further divided into management units. See Group Management Program Members table in Appendix B below.				

Non-SLIMF FMUs (Group or Multiple FMU Certificates)

Name	Contact information	Latitude/ longitude of Non-SLIMF FMUs	
Jackson Demonstration State Forest	-	39.352260	-123.558623
Mailliard Ranch	-	39.125488	-123.475307
Families Blue Lakes	-	40.54	-124.00

Tim Pricer	-	40.33	-123.68
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Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
Male workers: 254	Female workers: 27	
Number of accidents in forest work since previous evaluation:	Serious: 0	Fatal: 0

Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
unknown	Triclopyr	5.25 lbs	12 ac	Invasive weed control
unknown	Glyphosate	298 lbs	300 ac	Invasive weed control
unknown	Imazapyr	124 lbs	181 ac	Controlling competing vegetation

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	90,912
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	90,912
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	0
Silvicultural system(s)	Area under type of management
Even-aged management	0
Clearcut (clearcut size range)	0
Shelterwood	0
Other:	0
Uneven-aged management	
Individual tree selection	0
Group selection	0
Other: Mix of individual tree selection and group selection	90,912
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	0

Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)	
<i>Sequoia sempervirens</i> (redwood), <i>Pseudotsuga menziesii</i> (Douglas-fir), <i>Abies concolor</i> (white fir), <i>Tsuga heterophylla</i> (hemlock), <i>Lithocarpus densiflorus</i> (tanoak), <i>Arbutus menziesii</i> (madrone), <i>Abies grandis</i> (grand fir), and <i>Picea sitchensis</i> (Sitka spruce)	

FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1	W1-1 – Roundwood (logs)	<i>Sequoia sempervirens</i> (Redwood), <i>Pseudotsuga menziesii</i> (Douglas fir)
W1	W1-2 – Fuel wood	Any of the species listed save redwood and Douglas fir
W3	W3-1 – Wood chips	<i>Sequoia sempervirens</i> (Redwood), <i>Pseudotsuga menziesii</i> (Douglas fir)
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
none	none	none

Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	2,239

*Note: Total conservation and HCV areas may differ since these may serve different functions in the FME’s management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.

High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Type I and II old growth (JDSF and Mailliard Ranch); NSO core areas (most participant sites); MAMU areas (JDSF)	7,397
HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or	-	0

	containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	-	0
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	-	0
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	-	0
HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	-	0
Total area of forest classified as 'High Conservation Value Forest / Area'			7,397

Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.	
<input checked="" type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.	
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
Explanation for exclusion of FMUs and/or excision:	Jackson Demonstration State Forest is owned and managed by the State of California. It is the only California state forest to be certified; there are eight state forests in all. All other seven state forests are excluded from the scope of this certificate.
Control measures to prevent mixing of certified and non-certified product (C8.3):	None of the state forests are contiguous, nor do they conduct harvests or sales jointly – there is no risk of mixing certified wood products from JDSF with non-certified wood products from other state forests.
Description of FMUs excluded from, or forested area excised from, the scope of certification:	
Name of FMU or Stand	Location (city, state, country) Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)
LaTour	Shasta 9,033
Mountain Home	Tulare 4,807
Boggs Mountain	Lake 3,493
Soquel	Santa Cruz 2,681
Las Posadas	Napa 796
Mount Zion	Amador 164

