

Forest Management



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FM-02 - 24 July 2013



Certification Reassessment Report for:

Mendocino Redwood Company, LLC
In
Ukiah, California, USA

Report Finalized:	13 November 2015
Audit Dates:	25-28 August 2015
Audit Team:	Karen Brenner Stephen Grado Stefan Bergmann
Certificate code:	RA-FM/COC-000128
Certificate issued:	15 November 2015
Certificate expiration:	14 November 2020

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INTRODUCTION

This report presents the findings of an independent certification assessment conducted by a team of specialists representing the Rainforest Alliance. The purpose of the assessment was to evaluate the ecological, economic and social performance of Mendocino Redwood Company, LLC forest management as defined by the Principles and Criteria established by the Forest Stewardship Council™ (FSC®).

The Rainforest Alliance founded its previous SmartWood program in 1989 to certify responsible forestry practices and has grown to provide a variety of auditing services. Rainforest Alliance certification and auditing services are managed and implemented within its RA-Cert Division. All related personnel responsible for audit design, evaluation, and certification/verification/validation decisions are under the purview of the RA-Cert Division, hereafter referred to as Rainforest Alliance or RA.

This report contains four main sections of information and findings and several appendices. Sections 1 through 4 of the report plus Appendix I will become public information about the forest management operation and comprise a public summary of the full report that may be distributed by Rainforest Alliance or the FSC to interested parties. The remainder of the appendices are confidential, to be reviewed only by authorized Rainforest Alliance and FSC personnel bound by confidentiality agreements. A copy of the public summary of this report can be obtained on the FSC website at <http://info.fsc.org/>.

A key purpose of the Rainforest Alliance auditing is to recognize conscientious land stewardship through independent evaluation and certification of forestry practices. Forestry operations that attain FSC certification may use Rainforest Alliance and FSC trademarks for public marketing and advertising.

Standard Conversions

1 mbf = 4.8 m³
1 mbf = 2 cords
1 cord = 2.4 m³
1 cord = 0.5 mbf
1 gallon (US) = 3.78541 liters
1m³ = 0.41 cords
1m³ = 0.21 mbf
100 tons hardwood = 97 m³
100 tons softwood = 101 m³

1 acre = 0.404687 hectares

1. CLIENT SPECIFIC BACKGROUND INFORMATION

1.1 Ownership and land tenure description (legal and customary)

Mendocino Redwood Company, LLC (MRC), is owned and controlled by Sansome Forest Partners, Limited Partnership (hereinafter referred to as Sansome Partners) a private San Francisco-based firm specializing in long-term investments. The Fisher family is the primary investor in Sansome Forest Partners. In 1998, Sansome Partners acquired vast forest lands and formed MRC on June 30, 1998. MRC owns the property as a titled, fee simple property with clear tenure. In general, property boundaries are clearly identified on the ground. Surveyors are contracted on a regular basis wherever questions arise regarding boundary issues. MRC owns 228,852 acres of land in California: 219,997 in Mendocino County and 8,855 acres in Sonoma County.

As noted in MRC's FMP, prior to the 1850s MRC forest lands were largely unmanaged late successional redwood and Douglas-fir forests supporting communities of Native Americans (e.g., the Pomo, Yuki, Cahto, Wilaki, and Sinkiyone). These communities relied on adjacent oak woodlands for food, hunting, medicine, and most likely burned the forest every 20 years. In pre-settlement California, small populations of tule elk, pronghorn, and deer commonly grazed the resultant open grasslands. These species may have promoted growth in grasslands. As settlers arrived, herds of grazing cattle, sheep, and horses displaced these native species. Heavy grazing and invasion of non-native plant species have had negative impacts on many Mendocino County native grasslands.

In 1852, the first sawmill was built at Big River, ushering in the redwood lumber industry on the Mendocino Coast of California, though harvesting progressed slowly until 1900. Harvesting techniques included burning, tree felling, re-burning, and downhill yarding into and through watercourses. Splash dams also transported logs downstream to mills. These logging techniques caused extensive damage to stream channels, and riparian and aquatic habitat and species, the legacy of which MRC is still confronted with.

By the late 1970s, when most old-growth had been liquidated, harvesting tapered off, many less productive timber properties were subdivided into smaller parcels, and productive industrial forest lands were consolidated under fewer corporate ownerships. By the late 1980s, subdividing of forest lands had slowed considerably as a result of county planning and regulatory efforts. Many properties have traded hands several times over the last 35 years. The management goals for small forest land holdings are wide ranging including: timber management, recreational, aesthetic, wildlife-related, or spiritual in nature.

Companies such as Union Lumber, Albion Lumber, Mendocino Lumber, Rockport Redwood, Cottonveva Lumber, Rockport Redwood, and Southern Pacific Land were some of the early owners of what now comprise MRC forest lands. Later ownerships were held by the Masonite Corporation and Louisiana-Pacific Company. Harvesting started at the mouths of watersheds and progressed up-stream and up-slope to the ridgelines. Initial logging activities generally consisted of a regimen of burn, clearcut, and burn again. In response to tax laws in the 1940s and 1950s, many stands were managed to remove 70% of the stocking, typically the larger, healthier trees. Subsequent owners managed lands to maximize fiber output and the success of their mill investments. As a result, a significant portion of the MRC acreage is at reduced levels of conifer stocking with trees in smaller diameter size classes. Historically industrial ownerships in this region were heavily over-cut. MRC's lands were among those heavily harvested by previous owners. This led to the decline of some species that subsequently landed on rare, threatened and endangered (RT&E) species lists. RT&E species that most notably affects forestry on the north coast of California are the northern spotted owl, marbled

murrelet, Coho salmon, and steelhead trout and, specific to Mendocino County, the Point Arena mountain beaver.

Currently, timber management is the main activity occurring on MRC's land, with seven or eight hunting club leases maintained on the property. Ninety-five percent of MRC properties are in the timber producing areas of Mendocino County, accounting for 10% of the county's private land. Other industrial and nonindustrial forest lands along with small communities and subdivisions adjoin the property. In both Mendocino and Sonoma counties timber production, ranching, agriculture (primarily vineyard production), urbanization, recreation, and tourism are common land uses. MRC allows local residents access to their property for recreation and a variety of personal uses, but by permit only. Permits must be requested from the Forest Manager. No commercial recreational activities are permitted, and common uses include horseback riding, hiking, mushrooming, and picnicking. Additionally, some adjacent residents and landowners have use permits or easements for water resources, grazing, or road access with legal documentation kept in MRC's Ukiah, California office.

1.2 Legislative and government regulatory context

California has some of the most rigorous forest practice regulations in the United States. Regulations are developed by a governor appointed Board of Forestry and based on the Z'Berg-Nejedly Forest Practices Act of 1973 (FPA). Additionally, the federal Endangered Species Acts, the California State Endangered Species Act, EPA's Clean Water Act, and OSHA requirements also play a significant role in regulating forestry activities in California.

An overarching long-term sustained yield plan must be prepared for all ownerships larger than 50,000 acres (20,243 ha). Further, a Timber Harvest Plan (THP) must be prepared for every timber harvest project. A THP is considered the functional equivalent of an environmental impact report (EIR) under the California Environmental Quality Act (CEQA). Lead agencies for overseeing THP processes are the California Department of Forestry and Fire Protection (CalFire) and California Regional Water Quality Control Board (CRWQCB). The California Department of Fish and Wildlife (CDF&W) and the California Department of Mines and Geology (CDM&G) also provide significant inputs into the THP process. As a group, these agencies review written THPs and evaluate the company's compliance with the FPA by making on-site visits before, during, and after harvesting. Moreover, the THP process is a public process. The project proponent files their long-term plan and THP with the state and the public is given an opportunity to provide written or verbal comments to the agencies. Agencies are required to respond to each comment in writing. Additionally, the National Marine Fisheries monitors each project's protection of RT&E anadromous fish (i.e., salmon and steelhead). CDF&W monitors other RT&E species on behalf of the U.S. Fish and Wildlife Service. The state also regulates the protection of historical and archeological sites. Native American Tribes are given significant opportunities to protect sites of cultural importance.

MRC operates under a state (CalFire) approved Option A, which takes the place of a Sustained Yield Plan (SYP) and demonstrates compliance with the regulations under California's FPR and CEQA. Like an SYP, the Option A addresses management effects on timber resources, such as growth and harvest levels, while considering non-timber resources in each THP, such as watersheds, fisheries, and wildlife. MRC's Option A was first submitted in 1998, and updated in 2008 to incorporate newly designated Harvest Blocks. MRC has also been in the process of developing an HCP and NCCP since 2001. These two documents, in addition to an EIR and a Timber Management Plan, will make up the Program Timberland Environmental Impact Report (PTEIR). When finalized and approved by each applicable agency, it will replace the current Option A, and become MRC's primary harvest planning and conservation tool. Currently it is anticipated that these may become the guiding documents sometime in the next year or two. However, this is an extensive process including consultation with multiple agencies as well as a public review and comment period.

1.3 Environmental Context

The Mendocino Redwood Company owns 228,852 acres of land in California: 219,997 in Mendocino County and 8,855 acres in Sonoma County. Approximately 98% of the lands are forested. The balance is covered with grass, water, brush, or other non-timber vegetation. The MRC property is located in the California coast range of Mendocino and Sonoma Counties, California. Most of the land is within 20 miles of the Pacific Ocean, and lies within the fog belt that stretches from Central California to Oregon. This area comprises the primary habitat of coast redwood (*Sequoia sempervirens*). Rainfall is typically around 60 inches per year, with eighty percent occurring during the six months between November 1 and April 30. Topography varies from sea level to about 3,000 feet, and is marked by steep, narrow canyons. Primary rivers include the Russian, Gualala, Garcia, Albion, Navarro, Big, Noyo, and Eel.

The forests are dominated by redwood, Douglas-fir, and tan oak. Additionally, grand-fir and other hardwood species (i.e. black oak, live oaks, California bay, madrone) occur on the forest.

Soils of the region have mostly been formed on sandstones and shales, and to a lesser extent on slate, chert, limestone and schist. The coast range in Mendocino and Sonoma Counties is primarily underlain by folded and sheared marine sandstones and siltstones; schists; and dispersed metamorphic blocks and volcanic rocks of the Franciscan assemblage. Because of its underlying geology, MRC's property is subject to high rates of mass wasting and erosion due to steep topography, high uplift rates, weak rocks, and very sheared and faulted conditions of underlying bedrock.

Historically early harvest efforts started at the mouths of watersheds and progressed upstream and up-slope to the ridgelines. Initial logging activities generally clear-cut the old growth forests, then burned the slash while the logs were still on the ground before yarding them downhill to the river systems. Oxen were used to pull logs to mills or river systems. The rivers served as the transportation routes to the mills. Subsequent entries into the forests further inland were commonly accomplished with steam donkeys and railroads. During the 1940s, crawler tractors replaced steam donkeys and trucks replaced railroads to deliver logs to the mills. Clear-cutting continued to be a common harvest method.

Tax laws in the 1940s and 1950s required landowners to pay taxes on standing timber volume which encouraged landowners to remove the commercial conifer stocking resulting in harvests that removed the larger, healthier trees. Little effort followed harvesting to ensure that the areas harvested were stocked with conifers and able to grow amidst competition from hardwoods. The result of this 'high-grading' is that currently portions of the forest consist of unnaturally high densities of tanoak and other hardwoods. High intensity fires associated with burning slash and catastrophic wildfire (Comptche Fire in 1931, for example) also favored the establishment and rapid growth of tanoak and hardwoods. It has been hypothesized that the intensity associated with the Comptche Fire was due to high levels of lying dead wood associated with shake operations in the forest. The current density of the hardwoods (tan oak) results in a condition that limits the ability of redwoods and Douglas-fir to achieve desired or historical stocking levels. Without forest management, MRC land would retain the current high proportion of hardwoods, particularly tanoak.

Vegetation on MRC property is composed primarily of second and third growth natural forests. Mixed redwood and Douglas-fir stands, cover 134,468 ac (54,417 ha) or 63% of the property. Occurring in all MRC inventory blocks, this is the most common vegetation type on the property, ranging from young, regenerating forests to mature forests. Coastal redwood and Douglas fir are generally associated with each other in MRC forests. The composition of

conifer stands is related to environmental conditions. Coastal redwood, as its name implies, is found within 2-10 mi (4-16 km) off the coast, in areas of consistent fog, with high summer humidity, cool temperatures, and well-developed soils, while Douglas fir can occur on drier sites with poorer soils. Both species live for long periods of time; stand-replacing fires generally favor development of forests dominated by Douglas fir.

Coastal redwood and Douglas-fir forests and oak woodlands provide habitat for all of the RTE species managed and protected by MRC. In the upland and riparian portion of this natural community are northern spotted owls, marbled murrelets, Point Arena mountain beavers, Townsend big eared bat, and a handful of rare plants, including a robust population of Humboldt milk-vetch. The riparian portion of the forest also provides habitat for numerous threatened or endangered species, such as Coho salmon, Chinook salmon, steelhead, coastal tailed frogs, red-legged frogs, southern torrent salamanders, and various rare plants. Old-growth stands in the forest are especially important to species such as the marbled murrelet, and the Pacific fisher. Many bat species such as the Townsend big eared bat are associated with old-growth characteristics as well.

Natural disturbance includes mass wasting events, wind and fire. For the most part, fire suppression efforts resulted in the exclusion of fire from the area. The most recent large fire occurred on June 20-21, 2008, as lightning storms ignited approximately 129 fires in Mendocino County. The Mendocino Lightning Complex burned 54,817 ac; 23,196 of those acres were within MRC property. Due to the coastal influence of high humidity, historically, wildfire does not influence the landscape as dramatically as it does farther east in the state (i.e. sierra mountains)

1.4 Socioeconomic Context

Timber harvesting in Sonoma and Mendocino Counties has largely contributed to the overall socio-economic attributes of the area, and largely shaped the current economic and social climate. Commercial harvesting began in the late 19th century. After the 1906 San Francisco earthquake, timber extraction increased significantly and became the area's largest employer, bringing more people into the area and increasing population densities along the coast. Communities developed around sawmill sites along the coast (mostly at the mouth of rivers) as lumber was transported to San Francisco by ship. During the housing boom after World War II, more mills were built in the inland valleys as highways and railways provided the bulk of the lumber transportation. There were literally hundreds of sawmills in Sonoma and Mendocino Counties. In 1955, the area produced one billion board feet of lumber.

Timber production remained high until the mid-1990s, when the effects of long-term, severe over-harvesting began to lead to social conflicts over forest management in northern California, with forestry also becoming less important to the economy. Forest-related employment began to plummet. Reasons for the decline could be attributed to issues such as changes in mill technologies, corporate consolidation of the industry and associated downsizing, diminishing log supplies from historic over-harvesting versus available mill capacity, shifting policy priorities on public lands, and increases in environmental regulations. The timber industry has become a secondary employer and timber receipts and taxes lag behind the wine and tourism industries in both counties. In addition, with the exodus of higher paying lumber manufacturing jobs, Mendocino County, as opposed to Sonoma, has a relatively high rate of its residents living on public assistance.

According to 2013 census data estimates, Mendocino County is approximately 87% Caucasian and 24% Hispanic, with a Native American population well above the state average at over 6%. Sonoma County demographic statistics are almost identical, however with a much smaller Native American population (Note: The census allows one person to affiliate themselves with more than one race thus the total percentage is greater than 100%).

Since the late nineties, employment in most sectors of the economy has fallen significantly in Northwest California, though Sonoma County has fared better economically than Mendocino. As of 2013, the median annual household income of Sonoma County was \$63,356, versus \$43,369 in Mendocino County. The 2015 through June unemployment rate is 4.3 in Sonoma County and 5.1% in Mendocino County. Both are lower than the state average which is over 6%. Primary commercial enterprises in the area continue to be timber, agriculture, and tourism along the coast. Major employers in Mendocino County are city and county government offices, education, medical services, and wineries. Mendocino County is home to nine Indian Reservations, and local tribes include Pomo, Kahto, Yuki, and Eel River Athapaskan people. In the past, MRC has issued use agreements to the Pinoleville Pomo Nation, primarily regarding a piece of land that is managed jointly for traditional uses by the Tribe. MRC is willing to continue to facilitate similar agreements with area tribes when the opportunity arises.

A continuing activity, primarily in Mendocino County, but occurring throughout forested areas surrounding MRC, is the presence of marijuana growers and drug labs and their impact on the local economy. The marijuana market has grown considerably, and the money to be made from large-scale outdoor growing operations has grown in step and now accounts for a large portion of Mendocino County's economy. Numerous illegal gardens are now found on private and public lands, and while the business of growing marijuana has brought substantial economic gain for some local residents, despite its illegality, forestry activities have been disrupted. Concurrently, MRC and county resources devoted to law enforcement and marijuana eradication have increased, and the situation is now one of the top economic and law enforcement issues in the area. MRC, like many large private landowners, devotes substantial time, money, and effort toward securing their forests from illegal uses, patrolling their gates, and periodically conducting flyovers in collaboration with county and state drug enforcement agencies.

1.5 Workers

Number of workers including employees, part-time and seasonal workers:

Total workers	263 workers (provide detail below)	
• Local Full time employees (a:b)	248 Male	15 Female
• Non - Local Full time employees (c:d)	Male	Female
• Local Part time workers (e:f)	Male	Female
• Non- local part time workers (g:h)	Male	Female
Worker access to potable water on the work site	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Full time employees making more than \$2 a day	<input checked="" type="checkbox"/> YES	<input type="checkbox"/> NO
Number of serious accidents (past 12 month period)	1	
Number of fatalities (past 12 month period)	0	

2. SCOPE OF THE CERTIFICATE

2.1. Scope of the certificate

Mendocino Redwood Company's (MRC) forests comprise 92,711 hectares of privately owned timberland in Mendocino and Sonoma Counties, California, USA. The Rainforest Alliance assessed the entire ownership for combined Forest Stewardship Council (FSC) forest management and chain of custody certification. MRC has control over the entire property with regards to forest management operations. MRC does issue short-term leases and also issues short-term permits for various uses (i.e. hunting, grazing, private recreation). Generally, the leases and permits are of a very small scale with the primary intent to be neighborly and provide access to the forest for interested neighbors. There are also easements such as power lines across the property. Several adjacent landowners also access springs for domestic water use.

Forest management enterprise (FME) information:			
FME legal name:	Mendocino Redwood Company. LLC		
FME legal jurisdiction:	Delaware		
Type of legal entity	LLC		
Contact person (public):	Sarah Billig		
Address:	850 Kunzler Ranch Road, PO Box 996, Ukiah, California 95482		
Tel/FAX/email:	707-463-5125		
Website:	www.mrc.com		
Reporting period:	Previous 12 month period	Dates	June 2014-July 2015

A. Scope of Forest Area			
Type of certificate: single FMU		SLIMF Certificate not applicable	
Group or Multiple FMU	Number of group members (if applicable):		
	Total number of Forest Management Units FMUs: (if applicable, list each below):		
	FMU size classification within the scope:		
		# of FMUs	total forest area of FMU's
	< 100 ha		ha
	100 – 1000 ha		ha
	1000 – 10 000 ha		ha
	> 10 000 ha		ha
	SLIMF FMUs		ha
Group Certificate: List of FMUs included in the certificate scope provided in Appendix IV-a:			
Single/Multi-FMU Certificate: List of each FMU included in the certificate scope:			
FMU Name/Description	Area	Forest Type	Location Latitude/Longitude ¹
	ha		
	ha		
	ha		

B. FSC Product categories included in the FM/CoC scope (FSC-STD-40-004a)			
<input checked="" type="checkbox"/>	Level 1	Level 2	Species

¹ The center point of a contiguous FMU or group of dispersed properties that together comprise a FMU in latitude and longitude decimal degrees with a maximum of 5 decimals.

<input checked="" type="checkbox"/>	W1 Rough Wood	W1.1 Roundwood (logs)	Redwood (<i>Sequoia sempervirens</i>), Douglas-fir (<i>Pseudotsuga menziesii</i>), <i>Abies grandis</i>
<input type="checkbox"/>	W1 Rough Wood	W1.1 Roundwood (logs)	
<input type="checkbox"/>	W2 Wood charcoal		
<input type="checkbox"/>	W3 Wood in chips or particles	W3.1 Wood chips	
<input type="checkbox"/>	W4 Impregnated/treated wood	W4.1 Impregnated roundwood	
<input type="checkbox"/>	W5 Solid wood (sawn, chipped, sliced or peeled)	W5.1 Fitches and boules	
<input type="checkbox"/>	Non Wood Forest Products	[enter from FSC-STD-40-004a v2-0]	
<input type="checkbox"/>	other		

C. Species and Sustainable Rate of Harvest (AAC)				
Latin name	Common trade name	Annual allowable cut	Actual harvest (2014)	Projected harvest for next year
Douglas-fir; <i>Pseudotsuga menziesii</i>	Douglas-fir	Not separated by species m3	27,892 m3	30,806 m3
<i>Sequoia sempervirens</i>	Redwood	Not separated by species m3	46,284 m3	48,976 m3
<i>Abies grandis</i>	Grand fir	Not separated by species m3	2,468 m3	5,824 m3
		m3	m3	m3
Total AAC		162,585 m3	76,644 m3	85,606 m3
Total annual estimated log production:			76,644 m3	
Total annual estimates production of certified NTFP:			0 m3	
(list all certified NTFP by product type):			m3	
			m3	
			m3	

D. FMU Info	
Forest zone	Temperate
Certified Area under Forest Type	
• Natural	92,711 ha
• Plantation	0 ha
Stream sides and water bodies	2424 Linear Kilometers

E. Forest Area Classification	
Total certified area (land base)	92711 ha
1. Total forest area	91645 ha
a. Total production forest area	90475 ha
b. Total non-productive forest area (no harvesting)	1170 ha
• Protected forest area (strict reserves)	1170 ha
• Areas protected from timber harvesting and managed only for NTFPs or services	0 ha
• Remaining non-productive forest	0 ha
2. Total non-forest area (<i>e.g., water bodies, wetlands, fields, rocky outcrops, etc.</i>)	1066 ha
F. Ownership/Management Classification	
Ownership Tenure	Private owners

Management Tenure (<i>list primary tenure type for group certificates</i>)		private managed
Certified area that is: Privately managed	92711 ha	
State/Public managed	0 ha	
Community managed	0 ha	
G. Forest Regeneration		
Area or share of the total production forest area regenerated naturally		ha
Area or share of the total production forest area regenerated by planting or seeding		ha
Area or share of the total production forest are regenerated by other or mixed methods (describe) A mixture of natural regeneration and planted seedlings are used in harvest units.		100 %

H. High Conservation Values identified via formal HCV assessment by the FME and respective areas			
Code	HCV TYPES ²	Description:	Area
HCV1	Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Coho core areas, Lower Alder Creek Murrelet Area, northern spotted owl core areas, Point Arena Mountain Beaver	5377 ha
HCV2	Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		ha
HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.	Type I and II OG, pygmy forest, oak woodland, salt marsh	795 ha
HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).		ha
HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		ha
HCV6	Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	Significant cultural sites	4 ha
Number of sites significant to indigenous people and/or local communities			1

I. Pesticide Use		
<input type="checkbox"/> FME does not use pesticides. (delete rows below)		
FME has a valid FSC derogation for use of a highly hazardous pesticide	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
FSC highly hazardous pesticides used in last calendar year		
Name	Quantity (liters)	# of Hectares Treated
		ha
		ha
		ha
Non FSC highly hazardous pesticides used in last calendar year		
Name	Quantity (liters)	# of Hectares Treated
Element 3A (Triclopyr)	1476	401 ha

² The HCV classification and numbering follows the ProForest HCVF toolkit. The toolkit also provides additional explanation regarding the categories. Toolkit is available at <http://hcvnetwork.org/library/global-hcv-toolkits>.

Polaris SP (Imazapyr)	189	69 ha
Rotary 2.5 SL (Imazapyr)	45	32 ha
Round-up (glyphosate)	946	266 ha
Rodeo (glyphosate)	19	5 ha
Imazapyr 4SL (imazapyr)	2,646	1742 ha
Polaris AC Complete (Imazapyr)	322	196 ha

2.2. Exclusion and/or Excision of areas from the scope of certificate

X	Applicability of FSC partial certification and excision policy
<input checked="" type="checkbox"/>	All forest land owned or managed by the FME is included in the scope of this evaluation.

3. ASSESSMENT PROCESS

3.1. Certification Standard Used

Forest Stewardship standard Used for assessment:	FSC-US Forest Management Standard (v1.0); FM-35 RA COC Standard for FME
Local Adaptation: (if applicable)	None

3.2. Assessment team and qualifications

Auditor Name	Karen Brenner	Auditor role	Lead Auditor
Qualifications:	Over the past 17 years, Karen Brenner (B.S. Forestry) from the University of Idaho has conducted numerous CoC audits and assessments as well as 44 forest management audits and assessments for the Rainforest Alliance. Karen attended CoC and FM lead assessor training conducted by the Rainforest Alliance and also successfully completed ISO-9001 Lead Auditor Training in 2010. In addition to auditing for the Rainforest Alliance, Karen has over a decade of experience as a field forester preparing and administering timber sales, developing silvicultural prescriptions, suppressing forest fires, and managing pre-commercial and reforestation programs for the US Forest Service and the Nez Perce Tribe.		

Auditor Name	Stephen Grado	Auditor role	Socio-economic Auditor
Qualifications:	Dr. Grado is a Society of American Foresters (SAF) Certified Forester/Forest Certification Auditor #1155 and an SAF Fellow and the George L. Switzer Professor in the College of Forest Resources Department of Forestry at Mississippi State University. He received a Ph.D. in Forest Resources in 1992, a M.S. in Forest Resources and Operations Research in 1984, and a B.S. in Forest Science in 1979 at The Pennsylvania State University, State College, Pennsylvania. He also has a B.A. in Political Science from Villanova University near Philadelphia, Pennsylvania. Dr. Grado is certified to the ISO 9001:2008 standard for Quality Management Systems for Lead Auditors. Dr. Grado has served as a socio-economic assessor/auditor on 87 primarily Rainforest Alliance FM/COC pre-assessments (1, lead; 3, team), assessments (20 lead, 23 team), USDA Forest Service Test Evaluations (2 SW team, 1 SGS team), and numerous annual field audits (29 lead, 7 team; 1 SFI team). In addition, he has served as an assessor/auditor for innumerable Rainforest Alliance chain-of-custody (COC) assessments/ audits, and also served as a peer reviewer for numerous FSC FM/COC certification assessment reports.		

Auditor Name	Stefan A. Bergmann	Auditor role	Auditor, Forester
Qualifications:	Stefan A. Bergmann has been in the forestry and wood products field for nearly 15 years, working across the US in forest policy, landowner extension, executive leadership, and forest certification. Stefan is presently Associate Manager for Forest Management, overseeing the Forest Stewardship Council™ (FSC®) forest management certification program for the Rainforest Alliance, the world's leading FSC® forest management certifier. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, Corvallis, Oregon, USA		

3.3. Report peer reviewers

Consistent with FSC standards, a peer review was not required for this reassessment. However due to the high volume of stakeholder comments received, an independent, objective peer review was conducted to assess the analytical adequacy of the report sections related to these

comments and the validity of the corresponding conclusions. The peer reviewer is not affiliated with Rainforest Alliance and has no potential conflicts of interest that could jeopardize their independence and objectivity in evaluating this reassessment report.

Peer Reviewer Name	Anonymous
Qualifications:	The peer reviewer holds a B.S. in Biology, a Masters in Environmental Studies, and a Ph.D. in Ecological Economics, has been working on forest conservation issue for 25 years, mostly in the Pacific Northwest, but also nationally on forest carbon and ecosystem services. The peer reviewer also has 12 years of experience as a wildlife biologist working with endangered species, mostly northern spotted owls and marbled murrelets. The reviewer has co-authored federal habitat conservation plans and worked with field foresters to implement the plans on the ground. The peer reviewer has also worked on the regulatory side, helping field biologists and landowner foresters properly implement state forest practice rules for listed species. The peer reviewer started working on ecosystem services and financial incentives to increase large tree retention and lengthen rotations in the early 2000s and went back to school to study ecological economics. The peer reviewer has been working since then to develop programs and projects involving payments to private landowners for improvements in forest carbon, biodiversity, and watershed services.

3.4. Assessment schedule (including stakeholder consultation)

Date	Location /main sites	Main activities
Aug. 10-24, 2015	Auditors' Office	Document Review & Stakeholder Consultation
Aug. 25	MRC Ukiah, CA Office	Opening Meeting
Aug, 25	Casper, CA	Public Meeting Stakeholder Consultation
Aug. 25-28	Field Audit	Site Visits, Interviews, Document Review, Stakeholder Consultation
Aug. 28	MRC Ukiah CA Office	Closing Meeting
Sept. 1-20	Auditors' Office	Stakeholder Consultation
Total number of person days used for the assessment: 21 = number of auditors participating 3 X average number of days spent in preparation, on site and post site visit follow-up including stakeholder consultation 7		

3.5.1 Evaluation strategy

MRC holds a single FMU FSC FM Certificate that is 92,711 hectares in size. A variety of sites were visited over the course of 4 days. Sites were selected to provide review of the following:

1. A range of geographic areas across the FMU managed by a variety of employees.
2. A range of silvicultural prescriptions.
3. An opportunity to observe mitigation measures to protect cultural resources, rare, threatened, and endangered species, etc.
4. The use of both ground and cable logging systems.
5. Active and completed harvest units.
6. Demonstrating both natural and planting reforestation prescriptions.
7. The use of herbicides on units over the past 10 years (current as well as historical use).
8. Fire mitigation measures.
9. Riparian and stream protection.
10. Harvest and herbicide treatments visible along highways.
11. View specific areas of concern to stakeholders.
12. Management adjacent to High Conservation Value Forests.

13. Management adjacent to residential neighbors.

3.5.2 List of management aspects reviewed by assessment team:

Type of site	Sites Visited	Type of site	Sites Visited
Road construction	2	Property Boundary	2
Fuels Management	1	Bridges/stream crossing	3
Planned Harvest site	4	Domestic water source	3
Ongoing Harvest site	3	Steep slope/erosion	3
Completed logging	4	Riparian zone	6
Archeological/Historical site	2	Natural Regeneration	3
Planting site	3	Planting	3
Felling by harvester	1	Weed control	2
Felling by forest worker	1	Herbicide Treatment	6
Skidding/Forwarding	3	Endangered species	4
Cable Yarding	2	Wildlife management	7
Single & Group Selection	4	Dust Abatement & Water Draft	2
Overstory Removal	2	HCVF	1
Commercial Thinning	1	Neighbor Relations	2
Variable Retention	3	Recreational site	1
Transition Harvest	2	Local community	1

3.5. Stakeholder consultation process

The purpose of the stakeholder consultation strategy for this reassessment was threefold, to:

- 1) ensure that the public is aware of and informed about the assessment process and its objectives;
- 2) assist the field assessment team in identifying potential issues; and,
- 3) provide diverse opportunities for the public to discuss and act upon the findings of the assessment.

This process is not just stakeholder notification, but wherever possible, an attempt to seek detailed and meaningful stakeholder interaction. The process of stakeholder interaction does not stop after the field visits, or for that matter, after even a certification decision is made. Rainforest Alliance (RA) welcomes, at any time, comments on certified operations and such comments often provide a basis for field reassessments.

In the case of Mendocino Redwood Company (MRC), prior to the actual reassessment process and forest site visits, a public consultation stakeholder document was developed and distributed by e-mail and mail 60 days in advance. It was delivered to RA's own national list of stakeholders as well MRC's list of stakeholders with e-mail addresses. This list provided a basis for the reassessment team to select individuals for interviews (in person or by telephone or through e-mail), and to learn of sites that could be visited during the reassessment. The notice indicated that stakeholder inputs would be accepted until October 1, 2015.

A public stakeholder meeting was also held on August 25, 2015 at the Caspar Community Center. The meeting was advertised utilizing a variety of media. Approximately 91 stakeholders (not all in attendance signed in) attended the two plus hour function.

Stakeholder Type	Stakeholder that received the Notification (#)	Stakeholders Consulted Directly or Provided Input (#)
Academia	21	1
Adjacent Landowners	7	2
Anonymous	3	3
Board of Supervisors	3	1
Businesses	1	1
Environmental NGOs	41	4
Fire Departments	4	1
Forest Consultants	4	4
Forest Industry	54	1
Forestry/Forest Products NGOs	16	1
FSC-US	6	0
Government Agency	23	5
Journalists	3	3
Contractors	6	6
MRC Employees	31	31
Private Citizens	15	14
Rainforest Alliance Certificate Holders	57	0
Tribal Representatives	2	4
Water District	0	1
Leasee	0	2
Law Enforcement	0	1

4. ASSESSMENT FINDINGS AND OBSERVATIONS

4.1. Stakeholder comments received

The stakeholder consultation activities were organized to give participants the opportunity to provide comments according to general categories of interest based upon the assessment criteria. The table below summarizes the issues identified by the assessment team with a brief discussion of each based upon specific interview and/or public meeting comments.

All stakeholder comments are considered as part of the Rainforest Alliance evaluation of Mendocino Redwood Company's (MRC) forest management operations. In keeping with FSC rules, our evaluation is focused exclusively on MRC's forest management as compared to the detailed Criteria and Indicators contained in the FSC-US Forest Management Standard (V 1.0) (<https://us.fsc.org/forest-management-certification.225.htm>). Comments received that did not relate directly to the FSC-US Forest Management Standard v1.0 are not addressed in this report.

FSC Principle	Stakeholder comment	Rainforest Alliance response
P1: FSC Commitment and Legal Compliance	Stakeholders claimed that MRC has violated laws and regulations	MRC was found to be in compliance with laws and regulations applicable to their operation. MRC was found to be in conformance to the Indicators of P1 based on direct observations by auditors as well as interviews or e-mail exchanges with regulatory agencies.
P2: Tenure & Use Rights & Responsibilities	Several hunt club lessees interviewed had been associated with MRC for approximately 20 years and were very satisfied with the conditions of their leases.	No response needed.
P3 – Indigenous Peoples' Rights	Multiple tribal representatives described an open relationship and expressed appreciation for the cooperative relationship regarding the protection of cultural sites.	No response needed.
	Concern was expressed about the potential impact the herbicide treatments may have on the availability of tan oak acorns.	Numerous site visits confirmed that MRC is following their hardwood retention policy and leaving a minimum of 15 sq-ft basal area/per acre of tan oak within the treated units. Additionally, all true oaks, greater than 18" dbh are retained. Additionally, oak woodland stands outside of the conifer timber types are not treated with herbicides. Site observations demonstrated that oaks are retained in individual stands as well as across the landscape to provide for acorn production. So, no nonconformance with the FSC-US standard has been identified. Although some tribes expressed an interest to increase communication with MRC, they confirmed that they received the notification letters for each Timber Harvest Plan, which includes

		<p>hardwood/oak retention strategies, and that they have not responded to MRC's requests for input. However, MRC should ensure that direct culturally appropriate communication is attempted with area tribes. (OBS 02/15)</p>
<p>P4: Community Relations & Workers' Rights</p>	<p>Several stakeholders have claimed that MRC does not communicate with them.</p>	<p>Documented evidence, as well as stakeholder consultation, was reviewed by the auditors that confirmed that MRC makes a considerable effort to engage its stakeholders (e.g., on-site meetings, community meetings, meetings with neighbors). Interviews with several stakeholders confirmed MRC communications in advance of forest management activities. Several stakeholders interviewed attested to this, as they confirmed meeting with Forest Managers and walking the properties and discussing changes that could be made to future operations. However, certain individuals and groups denied ever having contact with MRC. The audit team contacted numerous stakeholders representing a wide range of interests. Most stakeholders expressed that MRC is available and receptive to conversations and receiving input. One stakeholder specifically mentioned, "There is a lot of misinformation in the public. MRC has worked a lot with neighbors to modify prescriptions and often goes above and beyond to work with neighbors." Additionally, MRC was able to provide written documentation demonstrating evidence of outreach and communication with individuals who denied having contact with MRC. Stakeholders were not able to provide evidence that MRC is not accessible or open to communication when contacted. MRC's stakeholder consultation was found to be in conformance with the FSC-US Standard.</p>
	<p>Stakeholders voiced concerns regarding the visual impact of the standing dead tan oak across the landscape.</p>	<p>Based on stakeholder comments received at the public meeting, the reassessment team visited a site of particular concern regarding visual impact. This is the only specific site referenced by stakeholders concerned about visuals/aesthetics. The standing dead trees are visible from the highway, which does not violate any laws or FSC requirements. This site stands out visually due to its adjacency and view from a major public road. However, in response to public concerns, MRC has implemented a new review process. Prior to prescribing herbicide treatments, a form is completed to evaluate the potential impacts to visuals. Copies of completed forms were reviewed by the auditors. Thus, in response to social monitoring, MRC acknowledged the need to improve the evaluation of the potential visual impacts and to also do a better job implementing mitigation measures to decrease</p>

		the visual impact of treatments. Other sites visited demonstrated the implementation of mitigation measures to address aesthetics. MRC was found to be in conformance with FSC-US standards regarding the management of aesthetics.
	Employees and contractors expressed job satisfaction.	No response needed.
P5: Benefits from the Forest	Stakeholders have concerns about the economic loss of treating tan oak with herbicides rather than harvesting tan oak for a commercial product.	Based on auditor interview, document review and observations, MRC does harvest tan oak for firewood when there is a willing purchaser and it is economically viable. Over 100 log truck loads of tan oak firewood have been delivered this year and the assessment team saw an active tan oak firewood processing yard. Also, in 2000, MRC invested significant resources building an oak flooring mill in an attempt to find a commercial option for the tan oak. The log quality of the tan oak proved to be insufficient for flooring and there are no other options to sustain the regular commercial harvest of the tan oak. Therefore, the project was abandoned. MRC was found to be in conformance with FSC-US standards regarding trying to find different markets for wood products and specifically tan oak.
	Stakeholders have expressed concern that MRC is developing larger Timber Harvest Plans and is concerned that this means that MRC is increasing the harvest levels.	Based on auditor review of individual Timber Harvest Plans (THPs), and interviews with MRC, some THPs include more acres than THPs written in the past. However, the total harvest volume has remained consistent and substantially below the state approved sustained harvest levels. It was found that growth exceeds harvest on the forest over a 10 year rolling average as required by the FSC-US standard. MRC was found to be in conformance with the FSC-US standard regarding the harvest levels.
	Several stakeholders expressed an appreciation for the employment generated from MRC's forest operations and the mill.	No Response needed.
P6: Environmental Impact	Several stakeholders expressed concern about aerial spraying of herbicides.	Interviews and document review demonstrated that during the 15 years that MRC has been certified only ground based application of herbicides has occurred. MRC does not apply herbicides using aerial operations. MRC was found to be in conformance with the FSC-US standard.
	Several stakeholders communicated their concerns about the effects of the use of herbicide on the health of the public. Specific concerns were raised regarding the potential health impacts to fire	MRC uses herbicides to control brush and hardwood competition with conifer regeneration. Auditors reviewed MRC chemical use through interviews with personnel, direct observation of sites with herbicide use and review of documentation. MRC does not use any chemicals designated by the FSC as

	<p>fighters from inhaling smoke from stands treated with herbicides.</p>	<p>Highly Hazardous. The chemicals are applied according to the laws and regulations of the state of California including taking precautions to protect the health of forest workers and the public. Written prescriptions are prepared and site-specific precautions are taken to both address worker safety as well as to protect non-target species. According to ToxNet Toxicology Data Network, a study conducted to measure the presences of herbicides, including Imazapyr, in the smoke of units treated with herbicides found that there was no detection in 140 samples taken from 14 different fires occurring within 30-149 days of treatment. Evidence collected demonstrated that MRC's use of herbicides is in conformance with the FSC-US Standard.</p>
	<p>Stakeholders have claimed MRC has increased the use of herbicides.</p>	<p>MRC purchased forest land in which many acres had previously been high graded and not regenerated to full stocking. Thus, the current stocking of hardwoods across the landscape exceeds the historical, preharvest, conditions. MRC's goal is to increase the stocking of redwood and Douglas-fir and decrease the stocking of oaks across the landscape. This strategy is only being implemented on sites historically dominated by redwood and/or Douglas-fir. Traditional oak woodlands are managed very differently. MRC has found that herbicides are the most effective and cost effective means of controlling the hardwoods while trying to establish redwood and Douglas-fir regeneration. Based on auditor review of documentation, MRC has reduced the total amount of chemicals applied on the forest over the past 15 years. After conducting several herbicide field studies, MRC did reduce the quantity of herbicide use by 44% in 2000-2002 and by 48% in 2003. Review of chemical use over the past 5 years shows the annual volume of herbicide used relative to the number of acres harvested is fairly consistent over the past 5 years. The actual volume of chemicals used does vary depending on the specific needs of the acres managed in a given year. Interviews indicate that the current leadership team is also encouraging the reforestation foresters to more closely evaluate the acres proposed for herbicide treatment. The reforestation staffing levels have been increased to provide the resources for more site-specific (acre by acre) prescriptions and the exclusion of smaller areas within a harvest unit. While the number of acres treated and the amount of chemical applied will continue to vary based on the specific sites harvested, it is expected that the general volume of chemicals used will remain similar to the current levels for</p>

		<p>the next 20-30 years. After about 20-30 years it is projected that the majority of the rehabilitation will have occurred and most of the acres will have been reforested with redwood and Douglas-fir; thus significantly reducing the need for herbicides. MRC's herbicide use was found to be in conformance with the FSC-US Standard and guidance to work toward reducing the use of pesticides and work toward eventually phase-out, if feasible.</p>
	<p>Stakeholders are concerned about a perceived increase in fire hazard created by the herbicide treatments that leave standing dead tan oak.</p>	<p>MRC has implemented a new monitoring and planning tool requiring all units to be evaluated for fire hazard prior to herbicide treatment. The implementation of this form was observed. Additionally, several sites were observed in which MRC is implementing site specific management to mitigate the fire hazard risk. Examples of management observed included, lopping and scattering slash as well as harvest and removal of tan oak adjacent to property lines. MRC is also planning fuel breaks in areas, given the topography and road access, that would provide potential control locations should a wildfire occur. Interviews with multiple individuals with decades of fire suppression experience indicated that the dead and dying tan oak does not significantly impact the fire hazard. Specific evidence was provided to the auditors by fire fighters based on the fire behavior observed during the 2008 fires on MRC lands. This evidence indicated there was not a notable difference in fire behavior in adjacent stands treated vs. not treated with herbicides and in some cases, the fire was easier to control in the treated stands. The leaves of tan oak contain oils that make even the live tree prone to carry fire.</p> <p>MRC fuels management complies with local laws. MRC was found to apply site-specific fuels management practices in conformance with the FSC-US Standard.</p>
	<p>Stakeholders express concern that tan oak is being removed from the landscape and that there are forest type conversions being made to convert oak stands to conifer stands.</p>	<p>Due to past (prior to MRC's ownership) logging and insufficient reforestation, the composition of tan oak across the landscape has increased significantly, compared to historical conditions. Many of these legacy stands were created prior to 1973 and the establishment of State required reforestation. Between 1953-1994 the hardwood stocking increase by over three fold according to <i>Committee Report: Hardwood Retention for North Coast California Timberlands, Northern Sonoma, Mendocino, Southwest Trinity, and Southern Humboldt Counties</i> prepared by The Regional Committee on Hardwood Retention, North Coast 1996. Field observations confirmed that MRC is not eliminating tan oak across the landscape nor</p>

		from within individual stands. MRC is not converting oak woodland stand types to conifers but rather restoring the conifer dominated stands that have historically occupied the sites. MRC was found to follow internal policies ensuring the retention of tan oak within each harvest unit and across the landscape. The tan oak retention, as well as other aspects of each THP is reviewed and approved by the various agencies participating in the THP review. Additionally, the state and federal agencies have reviewed the oak retention policy as part of the preparation of the draft Habitat Conservation Plan. MRC's tan oak retention was found to be in conformance with the FSC-US Standard.
	MRC has professional biologists and a botanical program. And MRC does a commendable job identifying, monitoring, and protecting rare, threatened, and endangered wildlife, fisheries and plant species. MRC maintains larger oaks and snags to provide quality habitat.	No response needed.
	Herbicides are used to eliminate tan oak and Pacific Madrone.	Field observations as well as the review of written prescriptions and policies confirmed that MRC is not eliminating tan oak nor Pacific Madrone.
P7: Management Plan	No comments received	No response needed.
P8: Monitoring & Assessment	No comments received	No response needed.
P9: Maintenance of High Conservation Value Forest	No comments received	No response needed.
P10 - Plantations	MRC is making a tree plantation. It should be a certification for plantations.	Based on auditor observations and review of documentation, it has been determined that MRC's management is not plantation management as defined in the FSC-US definitions of plantation. FSC defines a plantation as a forest area lacking in most of the principal characteristics and key elements of native ecosystems. Except for highly extenuating circumstances the following are classified as plantations: cultivation of exotic species, block plantings of cloned trees resulting in a major reduction of within stand genetic diversity, cultivation of any tree species in the areas that were naturally non-forested ecosystems. Field observations confirmed that MRC is not practicing plantation management as defined by the FSC-US Standard.

4.2. Summary of Evaluation Findings for FSC Forest Criteria

PRINCIPLE 1: Compliance with law and FSC Principles					
Criterion 1.1 Respect for national and local laws and administrative requirements					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 1.2 Payment of legally prescribed fees, royalties, taxes and other charges					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 1.3 Respect for provisions of international agreements					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 1.4 Conflicts between laws and regulations, and the FSC P&C					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 1.5 Protection of forests from illegal activities					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 1.6 Demonstration of a long-term commitment to the FSC P&C					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
PRINCIPLE 2: Tenure and use rights and responsibilities					
Criterion 2.1 Demonstration of land tenure and forest use rights					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 2.2 Local communities' legal or customary tenure or use rights					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 2.3 Disputes over tenure claims and use rights					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				

PRINCIPLE 3: Indigenous peoples' rights					
Criterion 3.1 Indigenous peoples' control of forest management					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 3.2 Maintenance of indigenous peoples' resources or tenure rights					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 3.3 Protection of sites of special cultural, ecological, economic or religious significance to indigenous peoples					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 3.4 Compensation of indigenous peoples for the application of their traditional knowledge					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
PRINCIPLE 4: Community relations and workers rights					
Criterion 4.1 Employment, training, and other services for local communities					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion. <u>Noteworthy Strength</u> MRC facilitates a Community Giving Program overseen by its Community Action Team. This activity along with other substantial donations, funding of scholarships, and in-kind support for community projects is an MRC strength.				
Criterion 4.2 Compliance with health and safety regulations					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 4.3 Workers' rights to organize and negotiate with employers					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 4.4 Social impact evaluations and consultation					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 4.5 Resolution of grievances and settlement of compensation claims					
Conformance	X	Nonconformance		NCR #(s)	

Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
PRINCIPLE 5: Benefits from the forest					
Criterion 5.1 Economic viability taking full environmental, social, and operational costs into account					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 5.2 Optimal use and local processing of forest products					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 5.3 Waste minimization and avoidance of damage to forest resources					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 5.4 Forest management and the local economy					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 5.5 Maintenance of the value of forest services and resources					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 5.6 Harvest levels					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was found to be in full conformance with this Criterion.				
PRINCIPLE 6: Environmental impact					
Criterion 6.1 Environmental impacts evaluation					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 6.2 Protection of rare, threatened and endangered species					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 6.3 Maintenance of ecological functions and values					
Conformance		Nonconformance	X	NCR #(s)	01/15

Finding (strength/weakness)	MRC was found to be in conformance with all the indicators of 6.3 except for Indicator 6.3.h., which addresses the identification, management, and monitoring of invasive species. (See NCR 01/15) <u>Noteworthy Strength</u> MRC has several specialists on the Forest Science staff including: wildlife biologist, botanist, hydrologist, and fisheries biologists. These professionals also have the support of several technicians. The Forest Science staff's input is valued and integral to the planning and implementation of forest management. The quality of the Forest Science staff was reflected in the management and monitoring of RTE species and implementation of improvement projects (i.e. wildlife enhancement, in-stream fish habitat improvement, road improvement, knowledge and identification of flora and fauna on the forest.)				
Criterion 6.4 Protection of representative samples of existing ecosystems					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 6.5 Protection against damage to soils, residual forest and water resources during operations					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion. <u>Noteworthy Strength</u> The design and maintenance of the road system were identified as strengths. A significant effort, as well as financial investment, has been made to decommission legacy roads impacting streams. Roads have been re-located to ridges, culverts have been replaced with bridges, and effective drainage structures such as rocked rolling dips have been installed.				
Criterion 6.6 Chemical pest management					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 6.7 Use and disposal of chemicals, containers, liquid and solid non-organic wastes					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 6.8 Use of biological control agents and genetically modified organisms					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion. MRC does not use biological control agents or GMOs.				
Criterion 6.9 The use of exotic species					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion. MRC does not use exotic species.				
Criterion 6.10 Forest conversion to plantations or non-forest land uses					
Conformance	X	Nonconformance		NCR #(s)	

Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			
PRINCIPLE 7: Management plan				
Criterion 7.1 Management plan requirements				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			
Criterion 7.2 Management plan revision				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			
Criterion 7.3 Training and supervision of forest workers				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	<p>MRC was determined to be in full conformance with this Criterion.</p> <p><u>Noteworthy Strength</u></p> <p>The employees of MRC were knowledgeable relative to their areas of responsibility. MRC has an impressive training program and mentorship for the forest technicians to help them grow their professional expertise. The effectiveness of the training was evident in the competency demonstrated by the foresters. Multiple individuals from regulatory agencies commended MRC staff for their professionalism.</p>			
Criterion 7.4 Public availability of the management plan elements				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			
PRINCIPLE 8: Monitoring and evaluation				
Criterion 8.1 Frequency, intensity and consistency of monitoring				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			
Criterion 8.2 Research and data collection for monitoring				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			
Criterion 8.3 Chain of custody				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			
Criterion 8.4 Incorporation of monitoring results into the management plan				
Conformance	X	Nonconformance		NCR #(s)
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.			

Criterion 8.5 Publicly available summary of monitoring					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion. Noteworthy Strength MRC goes above and beyond the FSC Standard with regard to making the results of monitoring publicly available. MRC makes publicly available on its website its full management plan, the results of various monitoring programs, and other information about the management of the FMU. Publicly available data includes the yield of all forest products harvested; growth rates, regeneration, and condition of the forest resource; composition and observed changes in the flora and fauna.				
PRINCIPLE 9: High Conservation Value Forests					
Criterion 9.1 Evaluation to determine high conservation value attributes					
Conformance		Nonconformance	X	NCR #(s)	NCR 02/15
Finding (strength/weakness)	MRC conducted a HCVF assessment that meets the FSC requirements. However, during the reassessment it was brought to MRC's attention that there is a water pump located on MRC land which supplies domestic water for about 90 people and this specific site was not included in the HCVF assessment process. (See NCR 02/15)				
Criterion 9.2 Consultation process					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 9.3 Measures to maintain and enhance high conservation value attributes					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
Criterion 9.4 Monitoring to assess effectiveness					
Conformance	X	Nonconformance		NCR #(s)	
Finding (strength/weakness)	MRC was determined to be in full conformance with this Criterion.				
PRINCIPLE 10: Plantations is not applicable.					

4.3. Identified nonconformances and Nonconformity Reports (NCRs)

A nonconformance is a discrepancy or gap identified during the assessment between some aspect of the FME's management system and one or more of the requirements of the forest stewardship standard. Depending on the severity of the nonconformance the assessment team differentiates between major and minor nonconformances.

- **Major nonconformance** results where there is a fundamental failure to achieve the objective of the relevant FSC criterion. A number of minor nonconformances against one requirement may be considered to have a cumulative effect, and therefore be considered a major nonconformance.
- **Minor nonconformance** is a temporary, unusual or non-systematic nonconformance, for which the effects are limited.

Major nonconformances must be corrected **before** the certificate can be issued. While minor nonconformances do not prohibit issuing the certificate, they must be addressed within the given timeframe to maintain the certificate.

Each nonconformance is addressed by the audit team by issuing a nonconformity report (NCR). NCRs are requirements that candidate operations must agree to, and which must be addressed, within the given timeframe of a maximum of one year period.

NCR#:	01/15	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-US Forest Management Standard (v1.0), Indicator 6.3.h			
Report Section:	Appendix II			
Description of Nonconformance and Related Evidence:				
<p>Indicator 6.3.h <i>The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</i></p> <ol style="list-style-type: none"> 1. <i>A method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</i> 2. <i>Implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</i> 3. <i>Eradication or control of established invasive populations when feasible: and, monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</i> <p><u>Findings</u> While MRC does have an invasive species management plan section in the FMP, it is both general and was found to not be fully implemented in the field. There is not a clear methodology or consistent implementation of monitoring or assessment of the extent of invasive species. Foresters informally report population locations to the reforestation forester. Due to the informal nature of the implementation of the invasive management plan there is not a consistent method used to determine the extent of the invasive species or the degree of threat to native species and ecosystems. Management practices such as cleaning logging equipment are implemented to decrease the risk of invasive establishment, growth and spread. MRC contractually requires contractors to wash their equipment prior to moving onto the forest. Observations in the field did not demonstrate the implementation of management practices targeting the control of populations. For example, a significant population of star thistle was observed untreated in and along a road-bed on a road in which the roadside brush was treated with herbicides within the past year. The monitoring of the control measures is left to the discretion of the area forester and thus it is informal and inconsistently implement.</p>				
Corrective Action Request:	<p>Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above.</p> <p>Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.</p>			
Timeline for Conformance:	Prior to the next annual audit			
Evidence Provided by Organization:	PENDING			
Findings for Evaluation of Evidence:	PENDING			
NCR Status:	OPEN			
Comments (optional):				

NCR#:	02/15	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-US Forest Management Standard (v1.0), Indicator 9.1.a			
Report Section:	Appendix II			
Description of Nonconformance and Related Evidence:				

Indicator 9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.

Findings

During stakeholder consultation it was discovered that there has been a long-term (since 1960) agreement to place a water pump on MRC property to provide a domestic water source for about 90 people. Interviews with stakeholders indicate a good working relationship between MRC and the community utilizing the water. However, the potential for this domestic water source to be an HCVF was not evaluated as part of the HCVF Assessment. Since this is just a small component of the otherwise conforming HCVF assessment, this NCR is being issued as a minor NCR.

Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.
Timeline for Conformance:	Prior to the next annual audit.
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

NCR#:	03/15	NC Classification:	Major	Minor X
Standard & Requirement:	FM-35 Rainforest Alliance Chain-of-Custody Standard for Forest Management Enterprises (FMEs) CoC 5.1			
Report Section:	Appendix III Chain-of-Custody			

Description of Nonconformance and Related Evidence:

COC 1.3: FME procedures/work instructions shall provide effective control of FSC certified forest products (including NTFPs) from standing timber until ownership is transferred at the forest gate. Note: For **large scale operations (>10,000ha) and Group Entities**, CoC procedures covering all relevant CoC criteria shall be documented. Including:

- a) Procedures for physical segregation and identification of FSC certified from non-FSC certified material. **(If applicable)**
- b) Procedures to ensure that non-FSC certified material is not represented as FSC certified on sales and shipping documentation. **(If applicable)**
- c) Procedures to include the FME's FSC certificate registration code and FSC claim (FSC 100%) on all sales and shipping documentation for sales of FSC certified products.
- d) Recordkeeping procedures to ensure that all applicable records related to the production and sales of FSC certified products (e.g. harvest summaries, sales summaries, invoices, bills of lading) are maintained for a minimum of 5 years.
- e) Procedures to ensure compliance with all applicable FSC/Rainforest Alliance trademark use requirements.

Findings

The documented CoC control system includes procedures to address item c. Items a and b are not applicable. Regarding items d and e, the documented procedures address all the requirements except the need to retain records for 5 years. The only reference to the tenure for keeping records is specific to keeping the truck ticket records for 7 years. The written procedures do not specify the length of time that any other records, including trademark approvals, are kept.

Note: The actual implementation of the procedures did include keeping all records including, trademark approvals for at least 5 years.	
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.
Timeline for Conformance:	Prior to the next annual audit.
Evidence Provided by Organization:	PENDING
Findings for Evaluation of Evidence:	PENDING
NCR Status:	OPEN
Comments (optional):	

4.4. Conformance with applicable nonconformity reports (Reassessments Only)

The section below describes the activities of the certificate holder to address each applicable nonconformity report (NCR) issued during previous evaluations. For each NCR a finding is presented along with a description of its current status using the following categories. Failure to meet NCRs will result in nonconformances being upgraded from minor to major status with conformance required within 3 months with risk of suspension or termination of the Rainforest Alliance certificate if Major NCRs are not met. The following classification is used to indicate the status of the NCR:

Status Categories	Explanation
Closed	Operation has successfully met the NCR.
Open	Operation has either <u>not met</u> or has <u>partially met</u> the NCR.

Check if N/A (there are no open NCRs to review)

NCR#:	02/14	NC Classification:	Major	Minor X
Standard & Requirement:	FSC-US Forest Management Standard (v1.0) July 8, 2010 Indicator 7.1.p.			
Report Section:	Appendix IV			
Description of Nonconformance and Related Evidence:				
<i>Indicator 7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.</i>				
<u>Findings</u> While the Forest Management Plan does describe and justify the types of harvesting systems and techniques; the sizes of the harvesting equipment is not described or justified.				
Corrective Action Request:	Organization shall implement corrective actions to demonstrate conformance with the requirement(s) referenced above. Note: Effective corrective actions focus on addressing the specific occurrence described in evidence above, as well as the root cause to eliminate and prevent recurrence of the nonconformance.			
Timeline for Conformance:	Prior to the next annual audit			
Evidence Provided by Organization:	The revised Forest Management Plan including a description of the types and size of harvesting equipment and systems and justifies the systems and techniques used.			

Findings for Evaluation of Evidence:	The description and justification of the equipment and harvesting systems included in the Forest Management Plan demonstrate conformance to Indicator 7.1.p.
NCR Status:	Closed
Comments (optional):	None

4.5. Observations

Observations can be raised when issues or the early stages of a problem are identified which does not of itself constitute a nonconformance, but which the auditor considers may lead to a future nonconformance if not addressed by the client. An observation may be a warning signal on a particular issue that, if not addressed, could turn into a NCR in the future (or a pre-condition or NCR during a 5 year re-assessment).

OBS 01/15	Reference Standard & Requirement: FSC-US Forest Management Standard (v1.0) July 8, 2010; Indicator 1.5.a
<p>Indicator 1.5.a <i>The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).</i></p> <p>MRC has two full-time security staff to provide monitoring and enforcement of illegal and unauthorized activities on the forest. Most entry points to forest stands are gated, with many having additional barriers on the gate ends to prevent passage into the forest. Monitoring for trespass is also accomplished by: forestry employees, contractors, and hunt club members.</p> <p>Examples of illegal activity of concern include marijuana gardens. The issue of trespass by marijuana growers is common in the region and not unique to MRC lands. Interviews with both law enforcement and MRC staff confirmed that they work closely together when issues arise, to identify and eradicate these locations. Interviews with both employees and law enforcement indicate that a decrease in garden eradication on MRC lands may be due to a decrease in surveillance. While MRC continues to patrol and monitor on the ground, MRC has stopped doing fly overs of the property specifically for the purpose of searching for illegal marijuana gardens on the property. Interviews with law enforcement indicate that overall in the county there has not been a decrease in marijuana garden trespass issues.</p> <p>Observation: The FME should ensure continued conformance to Indicator 1.5.a.</p>	

OBS 02/15	Reference Standard & Requirement: FSC-US Forest Management Standard (v1.0) July 8, 2010; Indicator 3.3.a
<p>Indicator 3.3.a <i>The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.</i></p> <p>Some tribes consulted expressed a concern about the impact of herbicide use on the tan oak and the resulting impact to the harvest of acorns. Interviews with tribes confirmed that they have received the, the notification letters for each Timber Harvest Plan, which includes hardwood/oak retention strategies, however, the tribes have not voiced this concern to MRC. MRC should ensure that direct culturally appropriate communication is attempted with area tribes as required in the guidance in the FSC-US standard.</p> <p>Observation: MRC should ensure continued conformance to Indicator 3.3.a.</p>	

OBS 03/15	Reference Standard & Requirement: FM-35 Rainforest Alliance Chain-of-Custody Standard for Forest Management Enterprises (FMEs) CoC 5.1
COC 5.1: FME shall have procedures in place that ensure all on-product and promotional FSC/Rainforest Alliance trademark use follows the applicable policies.	
While onsite, a publication entitled “Helping People Create Beautiful Outdoor Living Spaces” was observed that references SmartWood or SW terminology rather than Rainforest Alliance or RA. This publication was printed prior to the name change. Future printings of all publications require the use of the Rainforest or RA language.	
Observation: The FME should ensure continued conformance to CoC 5.1.	

4.6. Certification Recommendation

Based on a thorough review of FME performance in the field, consultation with stakeholders, analysis of management documentation or other audit evidence the Rainforest Alliance assessment team recommends the following:

Certification requirements met; Upon acceptance of NCR(s) issued above	<input checked="" type="checkbox"/>
Certification requirements not met	<input type="checkbox"/>
Subject to conformance with minor NCRs (if applicable), the FME has demonstrated that their described system of management is being implemented consistently over the whole forest areas covered by the scope of the evaluation	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	
FME’s management system, if implemented as described and subject to conformance with minor NCRs (if applicable), is capable of ensuring that all the requirements of the certification standards are met across the scope of the certificate	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	
Issues identified as controversial or hard to evaluate.	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Comments:	
Description of activities taken by the FME prior to the certification decision to correct major or minor nonconformity(s) identified during the assessment.	
Not applicable	
Certificate type recommended:	<input checked="" type="checkbox"/> Forest management and Chain of custody <input type="checkbox"/> Forest management only (no CoC)

Once certified, the FME will be audited annually on-site and required to remain in conformance with the FSC principles and criteria as further defined by regional guidelines developed by Rainforest Alliance or the FSC in order to maintain certification. The FME will also be required to fulfill the corrective actions as described below. Experts from Rainforest Alliance will review continued forest management performance and conformance with the corrective action requests described in this report, annually during scheduled and/or random audits.

APPENDIX I: Public summary of the management plan

1. Main objectives of the forest management are:	
Primary priority:	Raw material supply for integrated processing
Secondary priority:	
Other priorities:	biodiversity and increasing of nature values ; Maintained as investment to increase the value ;
Forest composition:	
MRC's forestland consists primarily of second and third growth redwood and Douglas-fir forests; as well as a hardwood component of tanoak and madrone. The forestland also includes patches of native oak woodland, grasslands, and pygmy forest	
Description of Silvicultural system(s) used:	
selective logging with cont. forest cover	
2. Silvicultural system	% of forest under this management
Even aged management	39 %
Clearcut (clearcut size range)	0 %
Shelterwood/Seed Tree	39 %
Uneven aged management	61 %
Individual tree selection	6 %
Group selection (group harvested of less than 1 ha in size)	9 %
Other types of management (explain) Since the forest has historically included even-aged management as well as high grading, it will take multiple harvests and reforestation efforts to move some units into a multi-aged stand ready for "traditional" uneven-aged management. Thus, a combination of the following prescriptions are used to move the forest toward an uneven-aged management system: Variable Retention, Transition, and Rehabilitation.	46 %
3. Forest Operations	
3.1 Harvest methods and equipment used:	Tractor and cable yarding using rubber-tired and tracked skidders; cable yarding machines.
3.2 Estimate of maximum sustainable yield for main commercial species:	68.9 million board feet
3.3 Explanation of the assumptions (e.g. silvicultural) upon which estimates are based and reference to the source of data (e.g. inventory data, permanent sample plots, yield tables) upon which estimates are based upon.	
The silvicultural prescriptions modeled include: uneven-aged management as well as even-aged silviculture designed to meet the rehabilitation goals of increasing the conifer stocking in stands with insufficient conifer stocking. Estimates are based upon inventory data which is based on field plots in strata; tree lists expanded across strata; modelling and harvest modelling based on a revised version of Cryptos. MRC's Option A (California required long-term sustained yield document - 913.11(a)). Additional detailed information regarding the silviculture, modeling and inventory is available to the public in MRC's Forest Management Plan and Option A which are available at http://www.hrcllc.com/plans-reports/	
3.4 FME organizational structure and management responsibilities from senior management to operational level (how is management organized, who controls and takes decisions, use of contractors, provisions for training, etc.).	
Management is organized with a vice-president making high-level decisions for the business. Chief forester provides additional oversight and review of long-term and policy-level decisions. Operations are divided into two forest managers (Inland and Coastal); forest science manager (oversees biological monitoring staff); inventory and GIS departments; and stewardship as well as a Director of Forest Policy.	
3.5 Structure of forest management units (division of forest area into manageable units etc.).	
Forest management units are divided into sustainability units for inventory, modelling, and management purposes. These are the larger units of assessment.	

3.6 Monitoring procedures (including yield of all forest products harvested, growth rates, regeneration, and forest condition, composition/changes in flora and fauna, environmental and social impacts of forest management, costs, productivity and efficiency of forest management).

Monitoring is ongoing and split into various responsibilities:

- 1) Forest science - covers biological aspects; monitors threatened and sensitive flora and fauna; hydrologic condition; etc. Variety of protocols and methodology for addressing this.
- 2) Reforestation - monitors planting and vegetation management efforts
- 3) Forest management -- monitors productivity; efficiency; costs; etc
- 4) Stewardship -- monitors social conditions/impacts of forest management; overall environmental impact
- 5) Inventory -- composition/changes in vegetation types; growth rates; etc.

3.7 Management strategies for the identification and protection of rare, threatened and endangered species.

When management activities are planned; screen activities to assess potential of RTE species occurring; if potential habitat or likelihood exists of species occurring - surveys are undertaken - if RTE species are identified - protection measures follow Forest Practice Rules, MRC management plan; state and federal endangered species act; etc.

3.8 Environmental safeguards implemented, e.g. buffer zones for streams, riparian areas, seasonal operation, chemical storage, etc.

Streams are buffered per MRC's Planning Agreement (additional protections were added to ensure protections meet minimums for FSC-US standards); each harvest plan has a road and operations plan to address precipitation thresholds for operations and mitigations for operations during wet season.

High Conservation Value Forest (optional)

Protect HCVs and RSAs as addressed and assessed in the management plan.

Commitment to Manage in Conformance with FSC Standards and Policies (optional)

<http://www.hrcllc.com/key-policies/forest-stewardship-council-fsc-certification/> commitment is there to be FSC-certified (thus implying conformance with standards and policies).

Other Sections may be added by the FME

None to add.