



2000 Powell St., Suite 600
Emeryville, CA 94608, USA

www.scscertified.com

Brendan Grady

bgrady@scscertified.com

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

Mendocino Redwood Company

SCS-FM/COC-00026N

850 Kunzler Ranch Road
P.O. Box 996, Ukiah, CA. 95482

Sarah Billig

sbillig@mendoco.com

CERTIFIED	EXPIRATION
30/Nov/2010	30/Nov/2015

DATE OF FIELD AUDIT
01-02/Sep/2011
DATE OF LAST UPDATE
10/Oct/2011

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 general 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 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

*Version 5-0
June 2011*

FOREWORD

Cycle in annual surveillance audits			
<input checked="" type="checkbox"/> 1 st annual audit	<input type="checkbox"/> 2 nd annual audit	<input type="checkbox"/> 3 rd annual audit	<input type="checkbox"/> 4 th annual audit
Name of Forest Management Enterprise and abbreviation used in this report:			
Forest Management Enterprise (FME)	Mendocino Redwood Company (MRC)		

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. A public summary of the initial evaluation is available on the SCS website www.scscertified.com.

Pursuant to FSC and SCS guidelines, annual/surveillance audits are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope audit would be prohibitive and it is not mandated by FSC audit protocols. Rather, annual audits 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 5.0 for a summary those CARs and their disposition as a result of this annual audit in the separate CAR report file);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to the audit; 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 audit.

All items marked with an asterisk (*) are not required for FMUs that qualify as single SLIMFs.

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Section A – Public Summary

1.0 General Information

1.1 Annual Audit Team

Auditor Name:	Kyle Meister	Auditor role:	Lead auditor
<p>Qualifications: Mr. Meister is a Certification Forester with Scientific Certification Systems. He has been with SCS for nearly three years and has conducted FSC pre-assessments, evaluations, and surveillance audits in Brazil, Panama, Mexico, Indonesia, India, and all major forest producing regions of the United States. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies. Mr. Meister has experience as an environmental educator and natural resource consultant in the U.S., Mexico, Ecuador, Costa Rica, Colombia, and Brazil. He is responsible for reviewing all of SCS' forest management reports from Latin America. He is a member of the Forest Guild, Society of American Foresters, International Society of Tropical Foresters, and the Cascade Green Building Council. Mr. Meister is also certified to the ISO 9001:2008 standard for Quality Management Systems for Lead Auditors.</p>			
Auditor Name:	Steve Grado, Ph.D.	Auditor role:	Lead auditor
<p>Qualifications: Dr. Grado is a Society of American Foresters (SAF) Certified Forester/Forest Certification Auditor #1155 and Fellow, a Professor of Forestry, and the George L. Switzer Professor in the 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 has served as a socio-economic assessor/auditor on 52 primarily SmartWood pre-assessments (1, lead; 3, team), assessments (5 lead, 20 team), USDA Forest Service Test Evaluations (2, SW team; 1, SGS team), and numerous annual field audits (13 lead, 5 team; 1 SFI team). In addition, he has served as an assessor/auditor for innumerable SmartWood chain-of-custody assessments/audits, and also served as a peer reviewer of FSC certification FM/COC assessment reports. Dr. Grado is also certified to the ISO 9001:2008 standard for Quality Management Systems for Lead Auditors.</p>			

1.2 Total time spent on evaluation

A. Number of days spent on-site assessing the applicant:	2.0
B. Number of auditors participating in on-site evaluation:	2.0
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	5.0
D. Total number of person days used in evaluation:	9.0
(Line D = (Total number of days in Line A x Total number of auditors from Line B) + additional days from Line C.	

1.3 Standards Employed

Box 1.3.1. – Applicable FSC-Accredited Standards

Version 5-0
June 2011

Title	Version	Date of Finalization
FSC-US Forest Management Standard	V1-0	July 8, 2010
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Forest Conservation Program homepage (www.scsertified.com/forestry). Standards are also available, upon request, from Scientific Certification Systems (www.scsertified.com).		

2.0 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary and Activities

FMU or other Location	Compartment/ Area	Site description / Audit Focus and Rationale for selection
1 – Sep – 2011		
Harmonic Concordance THP	9 units/180 acres	Herbicide treatment of tanoak, not all tanoaks treated, HCVF for oak woodlands, spotted owl protection area, archeological site within, fire exclusion, former grazing site
Miller Ridge	Unit #1/50 acres	Hardwood representative sample area, Native American village site within, herbicide treatment of tanoak
Special Site	1 tree with plaque and bench	Old growth redwood tree along Masonite Road; tree dedicated to Doris Schoenhoff, HCP writer; other old growth trees in the area
R and R THP	Unit#1/550 acres	Herbicide treatment of tanoak completed, site will promote the growth of redwoods and Douglas fir, viewed standing dead tanoak, area was planted with redwoods
R and R THP	Unit #2/70 acres	Herbicide treatment of tanoak, reduced rates of herbicides were being used, site was planted in redwoods
Middle John THP	Bridge work/125 acres	Bridges on John Smith Creek Road over John Smith Creek, two side by side rail cars, 1 of 4 bridges reinstalled in area, Coho Core Area, viewed road work on both sides of the bridge including water diversions, water bars, mulching, work not yet completed
Middle John THP	Bridge removal/ 125 acres	Removal of former Humboldt crossing next to John Smith Creek Road over John Smith Creek, no replacement, dirt pushed back from stream, area to be mulched, 1 ½ mile side road decommissioning
West of North Middle	Unit# 2/450	Variable retention, seed tree removal planned,

John THP	acres	interviewed Equipment Operator while working on installation of haul roads and turning points, installation of bridges, protection of creeks
Hedge Farm near Navarro Road Shop	7 acres	Viewed area used to produce seed source for the forest, lack of burning and other stressors necessitates the need to produce viable seed sources, located below a slope with protected grasslands
Navarro Road Shop	Navarro Road Shop	Interviewed employees (e.g., Roads Operations Manager, Financial Coordinator), toured the shop facility where field equipment and associated liquids are stored
Clearbrook THP	Unit#2/45 acres	Tractor logging area, 1/3 of volume taken, single tree selection, retention of largest trees, inspected road work, slash on skid roads, water bars, and Class 3 stream protection, retention trees, wildlife trees.
Orr Springs, California	Home of Adjacent Landowners	Meeting with stakeholders on issues related to herbicide use in the forest, and the presence of dead tanoak in the forest
2 – Sep – 2011		
Gulch 5 THP	1-10-073MEN/ 358 acres	Redwood forest, selection cut on 37 acres, variable retention cut on 221 acres with average basal area of 15 ft ² , this portion will have a longer reentry period. Observation of single tree and group retention, including large individual redwoods and groups of tanoak dominated overstory areas. Interviews with logging crew and truck driver.
Gulch 5 THP	1-10-073MEN/ 454 acres	Redwood forest, cable logged on 113 acres, CAT logged on 341 acres, 196 acres in transition, dragged slash out, skid trails to be reused, trying not to blade exposed soil, Class 3 stream with 50%canopy

3.0 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.

4.0 Annual Summary of pesticide and other chemical use

Commercial name of pesticide/herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year (ha)	Reason for use

			or ac)	
Not reported	Glyphosate	308 lbs	416 ac	
Not reported	Imazapyr	4375 lbs	5933 ac	Control of tanoak
Not reported	Triclopyr	182 lbs	331 ac	

5.0 Corrective Action Requests (CARs) and Observations (OBSs)

SCS publishes Corrective Action Requests (CARs) and Observations (OBSs) assigned as a result of previous evaluations, as well as their current status, as separate files on the FSC certificate database. Similarly, SCS publishes a separate file for any newly assigned CARs/OBSs as a result of the current evaluation.

6.0 Stakeholder Comment*

SCS conducts stakeholder outreach as part of annual audits in order to assess on-going conformance to the applicable FSC standards. Stakeholder consultation activities can include telephone calls, written letters, emails or consultation in the field. The results of stakeholder consultation activities are summarized below. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS have been noted.

The following stakeholder types were consulted:

Stakeholder type	Stakeholders notified (#)	Stakeholders consulted or providing input (#)
Academia	1	1
Adjacent Landowners	23	23
Business Owners	1	1
Consultant	1	1
Federal Agencies	1	1
FME Employees	18	18
Land Trust	1	1
Logger	1	1
Logging Contractors	5	5
Retired	2	2
State Agencies	2	2
Tribal Representatives	2	2
Trucking Contractor	1	1

Summary of Stakeholder concerns and audit team response:

Herbicide issues were raised among many stakeholders consulted before and during the audit. When asked, the FME is willing to work with these stakeholders and has made overtures to them in the past. There have been a few public meetings given by the FME on this issue since the last audit. The main issue is the control of tanoak with herbicides, which in their view pollutes streams, leaves poisoned wood in the forest, and creates a fire hazard with all of the standing wood. Alternatives considered by the FME such as cutting trees with chain saws is viewed by the FME as being more detrimental to the environment and worker safety and well-being since it requires multiple, intrusive entries into the forest due to chainsaw use, and associated fuel use, air quality issues, and ground compaction. This is also more economically unfavorable. The FME has setup some experimental plots looking at the effects of using smaller dosages of herbicides. Additionally, in response to stakeholder concerns over herbicide use, one FME Area Forester is conducting a literature review and has installed 2 to 3 informal study plots to test an alternative method of mechanical control. The FME sees tanoak removal as a forest restoration to redwoods and Douglas fir and this may eventually compliment their RSAs considerations. Tanoak has historically been a rather small component of the forest in region. Last, not all tanoak is being eliminated from the forest. It is scattered throughout the property and retained in both groups and as individual trees during timber harvests (target retention for hardwood is at least 15 square feet/acre basal area), and included in RSAs and tribal areas of concern to name a few.

On a related topic, some stakeholders concerned with the use of herbicides expressed concerns over the safety of workers who apply the chemicals. The audit team found that not only do contracts contain safety measures, but also that the FME provides guidelines and supervision to herbicide applicators on each site, including on the location of sensitive areas, use of personal protective equipment, and application amounts. FME has staff who can communicate effectively with contractors and their workers.

Another comment was received on the FME's retention practices. The claim is that the FME is not developing larger size class as it does not harvest trees over 48 inches, but will harvest stems under 48 inches in diameter. Under such a scenario, larger size classes would be precluded across the FMU as the FME would not allow trees to approach over 48" in diameter. A common practice in the region named by the stakeholder is that companies will mark retention trees and then harvest them during subsequent harvests. During the evaluation, the audit team saw several trees of just under 45" in diameter were being retained in the Gulch 5 tract. Furthermore, the FME's retention policies require retention throughout the stand and throughout diameter classes. The old growth characteristics used by MRC include a diameter limit of 48 inches DBH and over 200 years old; over 200 years old with a preponderance of OG characteristics; or over 200 years old and irreplaceable within 80-120 years. As the objective is to create a multi-aged stand, there is an incentive to favor a range of size classes. The FME's retention policies are available in the public summary of the forest management plan in its web site at www.mendocinoredwood.com.

Another comment is that Class III streams have few protections in regards to tree retention. The FME maintains at least a 50% canopy cover over these areas. The audit team observed several Class III streams with such retention in the Clearbrook and West of North Middle John THPs. FME's watercourse protection guidelines are further detailed in the latest version of the forest management plan.

Other stakeholders had positive comments about the FME's road management, stream crossing upgrades, adherence to tree retention policies, and adjacent landowner communication over timber harvests and protected areas.

7.0 Certification Decision

Box 7.1 Surveillance Decision	
The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments: None.	

Section B - Appendices

Appendix 1 – List of FMUs selected for evaluation (CONFIDENTIAL)

<input checked="" type="checkbox"/> FME consists of a single FMU – <i>No further action required</i>
<input type="checkbox"/> FME consists of multiple FMUs – <i>See table below, which applies to multiple FMU and group management evaluations, but is inapplicable if the scope of the evaluation is a single FMU.</i>

Appendix 2 – Evaluation of Management Systems (CONFIDENTIAL)*

Prior to arrival, the SCS team member reviewed the FME’s responses to open CARs and OBSs, and wrote team responses to each. These were reviewed by SW and comments were added as necessary. Upon arrival at the FME’s main office in Ukiah, California, the auditors examined a list of sites where harvesting and other activities (e.g., herbicide use) had occurred since the last audit. The auditors made a preliminary selection of sites to visit from various forest activity types (e.g., active harvesting jobs, completed harvest jobs, thinnings, herbicide spraying, road and bridge work) that would allow for evaluation of the FME’s conformance against the FSC-US National Standard. The preliminary list was later modified to balance the time allowed for the audit and with distances needed to travel to a diversity of sites. In the evening of the first day, SCS/SW met with a stakeholder group at the Cooperrider family’s house to listen to the group’s concern over herbicide and pesticide use. SCS/SW ended the day with a meeting with MRC aquatic, wildlife and forestry staff. The SW member of the team was primarily responsible for stakeholder outreach and analysis, forest inventory, chain-of-custody, tribal matters, and recreation activities and while SCS auditor primarily focused on HCVFs, RSAs, forest operation activities, environmental impacts, and stakeholder outreach to government regulators. Prior to auditor deliberations, SCS/SW conducted one more stakeholder interview over the phone and observed a demonstration of a new GIS tool in development to track the extent of invasive species. The audit team deliberated on selected criteria jointly and determined conformance or non-conformance based on consensus through a process of reviewing field observations on the site chosen for a visit, stakeholder inputs, and documented evidence.

Appendix 3 – Stakeholder analysis (CONFIDENTIAL)*

3.1 Stakeholder list (confidential)

FME Staff consulted

Name	Title	Contact	Type of Participation
Andersen, John	Area Forester, Albion	jandersen@mendoco.com	On-site interview
Armstrong, Andy	Reforestation Forester	aarmstrong@mendoco.com	Opening meeting, on-site interview
Bendure, Tom	Inventory Forester	tbendure@mendoco.com	On-site interview

Billig, Sarah	Stewardship Director	850 Kunzler Ranch Road P.O. Box 996 Ukiah, CA 95482707-463-5125 sbillig@mendoco.com	Opening meeting, e-mail contact, on-site contact, closing meeting
Danley, Sandy	Human Resource Manager	707-485-6737 sdanley@mendoco.com	E-mail contact
Douglas, Robert	Forest Science Manager	rdouglas@mendoco.com	On-site interview
Forrester, Colby	Area Forester	cforrester@mendoco.com	On-site interview
Garbocci, Liz	Executive Assistant	850 Kunzler Ranch Road P.O. Box 996 Ukiah, CA 95482 707-463-5113 707-272-9630 lgarbocci@mendoco.com	E-mail contact
Holmes, Jim	President	850 Kunzler Ranch Road P.O. Box 996 Ukiah, CA 95482 jholmes@mendoco.com	E-mail contact, on-site interview, closing meeting
Kiniery, Kevin	Forester	kkiniery@menddoco.com	On-site interview
Mertz, Bob	Chief Executive Officer	1360 19th Hole Drive Suite 200 Windsor, CA 95492 707-620-2974 bmertz@mendoco.com	Opening meeting
Rempel, Robb	Process Control Forester	rrempel@mendoco.com	On-site interview
Ross, Hayley	Wildlife Biologist	hross@menddoco.com	On-site interview
Savonen, Krista	Executive Assistant	ksavonen@mendoco.com	On-site interview
Shively, Russ	Area Forester	rshively@mendoco.com	On-site interview
Sullivan, Katelyn	Financial Coordinator	kbsullivan@mendoco.com	On-site interview
Ulrich, David	Aquatic Biologist	dulrich@menddoco.com	On-site interview
Vodopals, Kirk	Hydrologist	kvodopals@mendoco.com	On-site interview

List of other Stakeholders Consulted

Name	Organization	Contact	Type of Participation
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Allan, Don	Humboldt North Coast Regional Land Trust	P.O. Box 1233 Trinidad, CA 95570 707-677-0716 707-269-2063 don@nrsrcaa.org	Telephone interview
Bueren, Thad Van	Chairperson Westport Municipal Advisory Council, Adjacent Landowner	707-964-7272 thadvanbueren@directv.net	E-mail contact, telephone interview
Canfield, John and Virginia	Adjacent Landowner	None given	Meeting of stakeholders
Carr, Bruce (and spouse)	Adjacent Landowner	707-937-2991	Meeting of stakeholders
Carr, Lonny and Kristen	Adjacent Landowner	soulsconverge@gmail.com	Meeting of stakeholders
Cooperrider, Bret	Owners of the Ukiah ORGANIC Brewing Co. & Restaurant, Adjacent Landowner	ukiahbeer@gmail.com	Meeting of stakeholders
Cooperrider, Els and Allen	Retired Former Owners of the Ukiah ORGANIC Brewing Co. & Restaurant, Adjacent Landowner	18451 Orr Springs Road Ukiah, CA 95482 707-467-3770 707-937-6250 elsbraal@gmail.com	E-mail contact, meeting of stakeholders
D'Selkie, Terry	Adjacent Landowner	t@pacific.net	Meeting of stakeholders
Edmunds, David	Pineville Pomo Nation Tribal Office	707-463-1454	E-mail contact
Giusti, Gregory A.	Forest and Wildland Ecology Advisor, UC Cooperative Extension - Mendocino and Lake Co.	gagiusti@ucdavis.edu 707-263-6838 707-463-4495	E-mail contact, telephone interview
Johnson, Bill	Adjacent Landowner	william@wildblue.net	Meeting of stakeholders
Johnson, John and Jeanette	Adjacent Landowner	21455 Orr Springs Road Ukiah, CA 95482 j4ranch@gmail.com	Meeting of stakeholders
Krueger, Roger	Real Estate Consultant	707-463-5110	On-site interview
Landis, Richard	Logging contractor	cuz1949@widdle.net	Meeting of stakeholders
Lindstedt, Pam	Forest II, JDSF California Dept. of Forestry & Fire Protection - Cal Fire	707-964-5674 Pam.Lindstedt@fire.ca.gov	E-mail contact

Lipset, Larry	Adjacent Landowner	707-272-9366	Meeting of stakeholders
Maddrun, Tom	Adjacent Landowner	707-937-5139	Meeting of stakeholders
Madrigal, Martin	TS Logging, Logger	707-4439-1948	On-site interview
Many, Frank	Adjacent Landowner	None given	Meeting of stakeholders
Maranto, Chris	Inventory Forester, California Dept. of Forestry & Fire Protection - Cal Fire	chris.maranto@fire.ca.gov	E-mail contact
Matthews, Cody	Matthews Skyline Logging, Logger	707-743-2890	On-site interview
McCartney, Terry	EPA Liaison with Tribes	None given	Meeting of stakeholders
Moore, Elizabeth	Adjacent Landowner	rosalee2marie@yahoo.com	Meeting of stakeholders
O'Donnell, David and Sara	Adjacent Landowner	saraodo@gmail.com	Meeting of stakeholders
O'Ferrall, Travis	O'Ferrall Trucking	707-357-3333	On-site interview
Reichardt, Laura	Adjacent Landowner	None given	Meeting of stakeholders
Serraru, Seraiu	Adjacent Landowner	707-937-0627	Meeting of stakeholders
Shott, Eric	National Marine Fisheries Service, Fisheries Biologist	707-589-6059 eric.shott@noaa.gov	E-mail contact
Slotte, Ed	TS Logging, Logger	707-4439-1948	On-site interview
Smith, Evan	The Conservation Fund, Vice President, Forestland Acquisition and Finance,	8664 NW Springville Ct Portland, OR 97231 503-407-0301	E-mail contact
Turrell, Jeff	Adjacent Landowner	None given	Meeting of stakeholders
Vaine, Frank	Frank's Firewood, Owner and Logger	Boonville, CA 707-895-2113	Telephone interview
Vogel, Barry	Attorney and Counselor, Adjacent Landowner	280 North Oak Street P.O. Box 383 Ukiah, CA 95482 707-462-6541 vogelaw@pacific.net	Meeting of stakeholders, e-mail contact

3.2 Stakeholder review, complaints, and resolution

Herbicide issues were raised among many stakeholders consulted before and during the audit. When asked, the FME is willing to work with these stakeholders and has made overtures to them in the past.

There have been a few public meetings given by the FME on this issue since the last audit. The main issue is the control of tanoak with herbicides, which in the stakeholder view pollutes streams, leaves poisoned wood in the forest, harms animals, causes cancer, and creates a fire hazard with all of the standing wood. The cumulative ecological and health effects of herbicide use are also of concern. However, cumulative effects must be addressed as part of the California THP process. Alternatives considered by the FME such as cutting trees with chain saws is viewed by the FME as being more detrimental to the environment and worker safety and well-being since it requires multiple, intrusive entries into the forest due to chainsaw use, and associated fuel use, air quality issues, and ground compaction. This is also more economically unfavorable. The FME also has setup some experimental plots looking at the effects of using smaller dosages of herbicides. One FME area forester has started a literature search on tanoak in response to stakeholder concerns. He has installed 2 to 3 informal experimental plots to see if a previously untested mechanical control method will be effective. The FME sees tanoak removal as a forest restoration to redwoods and Douglas fir and this may eventually compliment their RSAs considerations. The auditors confirmed that tanoak has historically been a rather small component of the forest in region. Last, not all tanoak is being eliminated from the forest. It is scattered throughout the property, and included in RSAs and tribal areas of concern to name a few. In conclusion, it was the auditors' opinion that MRC is in overall conformance to the FSC-US Standard for chemical use. Furthermore, the FME's continued research into application methods, chemical use, and non-chemical control supports their commitment to reducing chemical applications over time. However, the auditors have requested renewed efforts by the FME to quell this situation, but recognize the constraints for doing so.

One stakeholder alleged violation of a settlement agreement by the FME's re-painting of a previously demarcated and painted boundary line. The complainant alleges that the FME must inform the group of all non-timber harvest-related management activities at least 14 days prior to their occurrence and 30 days prior for timber harvests. The FME produced a copy of the settlement agreement. The audit team could find no such language in the settlement agreement and thus found the complaint to be unsubstantiated.

Appendix 4 – Additional Audit Techniques Employed (CONFIDENTIAL)*

The audit team did not employ any additional audit techniques for this annual surveillance audit.

Appendix 5 – Changes in Certification Scope

Changes in Certificate Scope			
<i>Check all applicable changes and include updated information</i>			
<input type="checkbox"/>	Organization name		
<input type="checkbox"/>	Contact person	Name:	
		Telephone:	e-mail:
<input type="checkbox"/>	FSC salesperson	Name:	

	Telephone:		e-mail:	
<input checked="" type="checkbox"/>	Website address	www.mendocinoredwoodcompany.com		
Certificate information				
<input type="checkbox"/>	Certificate Type	<input type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU	
		<input type="checkbox"/> Group		
<input type="checkbox"/>	SLIMF <i>if applicable</i>	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate	
		<input type="checkbox"/> Group SLIMF certificate		
<input type="checkbox"/>	Group Members <i>if applicable</i>	# of Group Members		
<input type="checkbox"/>	Number of FMUs in scope of certificate	#		
Total forest area in scope of certificate which is:				
<input type="checkbox"/>	privately managed ¹	ha or ac		
<input type="checkbox"/>	state managed	ha or ac		
<input type="checkbox"/>	community managed ²	ha or ac		
Number of FMUs in scope that are:				
<input type="checkbox"/>	less than 100 ha in area	#	100 - 1000 ha in area	#
	1000 - 10 000 ha in area	#	more than 10 000 ha in area	#
Total forest area in scope of certificate which is included in FMUs that:				
<input type="checkbox"/>	are less than 100 ha in area	#		
<input type="checkbox"/>	are between 100 ha and 1000 ha in area	#		
<input type="checkbox"/>	meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	#		
<input type="checkbox"/>	Division of FMUs into manageable units:			
	Describe any changes as to how FMUs are divided into manageable areas, units or stands.			

Social Information		
Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender): 42		
36 # of male workers	6 # of female workers	
Number of accidents in forest work since last audit	Serious	Fatal
	# 1	# 0

¹ The category of 'private management' includes state owned forests that are leased to private companies for management, e.g. through a concession system.

² A community managed forest management unit is one in which the management and use of the forest and tree resources is controlled by local communities.

Conservation Areas				
<input type="checkbox"/>	Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives		<i>ha or ac</i>	
High Conservation Value Forest/ Areas				
High Conservation Values present and respective areas				
	Code	HCV Type³	Description & Location	Area
<input checked="" type="checkbox"/>	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	13,288 ac
<input type="checkbox"/>	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.	None	0 ac
<input checked="" type="checkbox"/>	HCV3	Forest areas that are in or contain rare, threatened or endangered ecosystems.	Type 1 and ii Old Growth, pygmy forest and salt marsh (Albion), oak woodland (Rockport and Ukiah).	1,964 ac
<input type="checkbox"/>	HCV4	Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	None	0 ac
<input type="checkbox"/>	HCV5	Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	None	0 ac
<input checked="" type="checkbox"/>	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 native American cultural sites	TBD
<input type="checkbox"/>	Total Area of forest classified as 'High Conservation Value Forest'			<i>15,252 ac</i>
ANY REDUCTION IN HCVF/HCVA AREA OR CHANGES IN HCVF/HCVA CLASSIFICATION MUST BE REVIEWED BY SCS TO ENSURE COMPLIANCE WITH FSC CONVERSION POLICIES AND THAT ANY REDUCTION IS EITHER THE RESULT OF CREDIBLE FIELD ANALYSIS AND RECLASSIFICATION OR THE SALE OF LANDS TO OTHER FORESTRY COMPANIES, CONSERVATION GROUPS, STATE AGENCIES, ETC.				

³ High conservation values should be classified following the numbering system given in the ProForest High Conservation Value Forest Toolkit (2003) available at www.ProForest.net or at www.wwf.org

Appendix 6 – Pesticide derogations

MRC does not have any pesticide derogations.

Appendix 7 – Detailed observations (CONFIDENTIAL)

Evaluation year	FSC P&C Reviewed
2010	All – Recertification Evaluation
2011	FSC US Criteria: 1.5, 2.2, 2.3, P3 , 4.2, 4.4, 5.2, 5.3, 5.4, 5.6, 6.2, 6.3, 6.4, 6.5, 6.7, 6.9, 6.10, P7 , 8.2, 8.3, and P9 .
2012	
2013	
2014	

C= Conformance with Criterion

C/NC= Overall Conformance with Criterion, but there are Indicator non-conformances

NC= Non-Conformance with Criterion

REQUIREMENT	C/NC	COMMENT/CAR
P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
C1.1 Forest management shall respect all national and local laws and administrative requirements.		
C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	C	
1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).	C	<p>In general, the FME uses its employees, in particular its security staff, monitor the forest for unauthorized activities. The FME has two security officers that are active on the property and work in full cooperation with local and state law enforcement. Public access to the FME’s land is by permit only. Observations by the auditors in the field viewed gated and locked access and saw little in the way of debris in the forest and along roadways or damage from other uses (e.g., ATV use).</p> <p>There are continual issues with marijuana gardens and other trespassers throughout FMU. On an ongoing basis, FME staff report any marijuana gardens, trespassers, and vandalism on their lands to security staff. Depending on the situation, security staff will do one, or a combination, of the following: inform the Mendocino County Security Office, increase patrols, install security cameras, and enlist road crews or forestry staff to help address this situation. During 2011, much of property was flown by the County of Mendocino Marijuana Eradication Team (COMMET) in May and June</p>

		2011. A list of marijuana gardens identified by COMMET was passed on to forestry staff so they could avoid these areas until gardens are removed. The FME has hired a private helicopter to fly its lands from August 16-18, 2011 in areas that either COMMET did not fly, are traditional marijuana growing zones, or FME staff have reason to suspect there is activity. Post flight, any gardens identified will have their location reported to the COMMET for eradication.
1.5.b. If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	<p>Interviews with FME employees provided a sense of confidence in the auditors that they are well-trained on appropriate actions to take should they come across illegal activities in the forest. In all cases, they are to report these incidents to their supervisors and security staff and the latter will communicate these incidents to the appropriate county and state authorities. In term of illegal drug-related activities contacts include COMMET and the California Bureau of Narcotic Enforcement’s Campaign Against Marijuana Planting (CAMP).</p> <p>Recent surveillance flights, which are to be held at least twice a year, indicate a potential decrease in marijuana gardens on the FME's forest lands. The last fly over of a large portion of the Rockport tract (typically subject to many marijuana gardens) detected no presence. It is apparent that the FME is making progress on deterring illegal marijuana gardeners on its forest lands.</p>
P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
<p>C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p> <p><i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i></p>	C	
2.2.a. The forest owner or manager allows the exercise of tenure and use rights allowable by law or regulation.	C	The FME has allowed for the exercise of tenure and use rights on the forest. The auditors interviewed the FME’s Real Estate Consultant, who has a 39 year history with its forest lands. There are a number of ways in which others may access the FME’s property. They include going through the FME’s permit system (e.g., to gather firewood, for recreation), entry agreements which require insurance (e.g., Boy Scout activities), licensing agreements (e.g., partial use of the forest by a neighbor), and deeded rights [e.g., reciprocal rights-of-way (ROW) for road access with adjacent landowners, power lines and telephone lines].

		<p>The FME has a Public Access policy in their forest management plan (FMP, p. 55), which allows for non-commercial recreational activities, hunting, fishing and collection of non-timber forest products by permit or entry agreements. Permit or entry agreement requests may be made by telephone, mail, or in-person, and most permits are issued by Area Foresters or from the FME's main office. Permits or entry agreements allow short-term entry (typically 1 to 7 days of access). There are approximately 50 permits or entry agreements issued per year. The decision to issue a permit or entry agreement considers the intended activity, whether there are active forest operations in the area, knowledge of the person(s)/group(s) making the request, and, when appropriate, whether the person/group holds insurance (e.g., for horseback riding groups).</p> <p>The FME issues licensing agreements for activities/uses such as domestic water use, cattle grazing, and to accommodate situations where development has illegally taken place on the FME's property (e.g., a structure build over the FME's property line). These licenses represent a formal agreement between MRC and outside parties, they have an indefinite term (which can be cancelled by the FME with a 30 day notice), and can only be assigned to another party with the FME's permission. Approximately 20 to 30 licenses exist, and the agreements are filed within the FME's Ukiah, California main office.</p> <p>There are approximately 30 legally established use and access deeded rights on the FME's property. Use rights that are permanent grants are recorded in the Recorder's office in Mendocino County with copies filed in the FME's Ukiah, California main office.</p>
<p>2.2.b. In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.</p>	<p>C</p>	<p>When a THP is proposed, the Area Forester or related staff has direct communication with individuals and groups that have licenses and use grants. Concerns regarding potential impacts to rights are discussed (e.g., impacts to water quality and quantity), and mitigation measures are proposed (e.g. stream buffers).</p> <p>The auditors interviewed MRC's Real Estate Consultant and were given explanations, and documents to review to be able to conclude that the FME is in compliance with the FSC Standard. The FME has also asked foresters to maintain a desktop shortcut to the FME's newly developed Land Records System, which is an automatic system linking use rights to a THP and can then be accessed during the THP preparation process.</p>

		<p>The FMP contains cases where consultations have taken place and agreements struck to protect use rights. For example, the FME has entered into three separate conservation easements on their property where certain harvesting and development rights have been legally restricted so as to not impinge upon other uses of the forest.</p> <p>The auditors were not aware of any concerns about regarding the FME's consultation efforts.</p>
<p>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>	C	
<p>2.3.a. If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>	C	<p>The auditors have not uncovered any significant disputes over tenure or use rights. A stakeholder of the land trust, Friends of Enchanted Meadows, stated to the audit team that according a "Settlement Agreement and Release of All Claims" the FME must notify her group of all non-timber harvesting management activities in the areas cited under the agreement 14 days prior to initiation and 30 days prior to any timber harvesting activities. With the assistance of the FME's Real Estate Consultant, the auditors examined the agreement (signed in 1997), in which the FME agreed to the specific terms after acquiring the FMU from the former owner. The document does not contain any clauses related to any required notification of forest management activities. According to the agreement, the FME is not allowed to harvest timber in areas to be transferred to the land trust per the conditions detailed in the agreement. The FME is allowed to use the road, however, to conduct its access the FMU and transport equipment and harvested forest products.</p> <p>On an Oceans Unlimited inholding in South Coast, owners claimed they had the right to use the FME's road. The FME disputed this and a judgment was made in their favor. Oceans Unlimited has appealed, and the case is to be heard in court during September 2011.</p>
<p>2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.</p>	C	<p>The FME maintains documentation of all tenure and use rights on site. The FME was able to produce documents from a settlement made under Louisiana-Pacific that it agreed to respect the terms of the agreement. See Indicator 2.3.a for more details on the settlement agreement.</p>
<p>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>C3.1. Indigenous peoples shall control forest management on their lands and territories unless they</p>	NA	<p>FME does not have rights to any concessions on Native American Indian FMUs.</p>

delegate control with free and informed consent to other agencies.		
3.1.a. Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	NA	
3.1.b. The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.	NA	
C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.		
3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	There are no established tenure rights of indigenous peoples on FME forest lands. However, the FME recognizes that many of their forest land areas have resources that are irreplaceable in nature, such as significant archaeological sites. By FME policy (FMP, p. 58), all harvest operations require notification to local tribes. All potential harvest operations undergo an archaeological survey as well. If sites are located during the survey, tribes are notified again and invited to participate in designing protection measures.
3.2.b. Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	The FME works, with as much input as it can gather from consultations, to protect key resources for local tribes such as tanoak groves, oak woodlands, and areas with concentrations of basket-weaving materials. In an interview with a tribal representative, it was verified that this is in fact the case with this tribe. The FME maintains several sections in its FMP detailing measures for protection of tribal areas of interest. This includes a general policy on consultation and notification (p. 58) and specific consultations that have taken place for oak woodlands and significant archaeological sites (pp. 34-35).
C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.	C	
3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.	C	The FME utilizes a Native American contact list maintained by Cal Fire's California Department of Forestry (CDF) to ensure that appropriate consultation occurs with interested, local tribes prior to any forest management activity. Cal Fire requires that prior to any proposed THPs, all Native American tribes on its contact list, within the area of interest, be contacted via a letter to request any knowledge of cultural, ecological, economic, or religious sites or other sites of significance within the project area. If an archaeological site is discovered during survey efforts, tribes on the list are contacted a second time to enable participation in designing

		<p>protection measures. An example of this letter was provided to the auditors. Thus, with a process established to contact tribes through CDF, the FME has shown that it is able to potentially reach a broad base of federally and non-federally recognized tribes in the region for consultation.</p> <p>Since the last audit the FME has attended a Mendocino-Sonoma Tribal Environmental Programs directors' meeting on February 15, 2011 in the Hopland Tribe Community Hall to provide an update on its HCVF and RSA designations, the FME's forest management opportunities, and to open the door for further discussions and opportunities with the tribes. The FME distributed its business cards and information on its forest management. Through its meetings with tribal members, the FME has attempted to address sites of ecological and economic significance as well. A sign-in sheet of attendees was provided to the auditors.</p> <p>The FME has also undertaken various discussions and attempts to find personal contacts for consultations within the three known unrecognized tribes in the region. It was able to set up a meeting on July 6th with two members of the Yokayo group to enable better opportunities for cooperation. They were given an application to be on Cal Fire's Native American contact list and were interested in opportunities to collect sedge for basket making activities. The group knew of sedge beds on the Navarro River and the FME is currently working to accommodate this opportunity.</p> <p>The FME has been unable to set up meetings with members of the other tribes, the DELEMA and SheBelNa, so it recently sent letters inviting them to complete the Cal Fire application to be on the Native American Contact list as well as a map of the FME's forest lands so they could determine if they were interested in providing feedback its operations. The FME also provided personal invitations to tour their forest lands or meet in person regarding activities and any cultural sites of significance they may know about. Those letters were sent on July 20, 2011 and provided to the auditors.</p> <p>In general, these meetings, THP notifications, post-discovery letters sent to tribes, and attempts to reach both recognized and non-recognized tribes in the region provides a strong indication that the FME is indeed attempting to protect or enhance areas of significance. Again, this was also supported through an interview conducted by the auditors with one tribal representative.</p>
3.3.b. In consultation with tribal representatives, the forest owner or manager develops measures to protect or	C	See 3.3.a. Consultations are ongoing.

enhance areas of special significance (see also Criterion 9.1).		
C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.	NA	FME does not utilize any traditional indigenous knowledge in its management practices.
3.4.a. The forest owner or manager identifies whether traditional knowledge in forest management is being used.	NA	
3.4.b When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	NA	
3.4.c. The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.	NA	
P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	C	
4.2.a. The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).	C	<p>As confirmed with the Human Resources Manager, the FME originally worked with Burriss, Thompson & Associates to develop job descriptions that were then reviewed by employees and supervisors to develop and implement a base pay compensation program. Since then the FME has used a combination of resources to maintain their total compensation program (i.e., wages, benefits including health benefits, bonuses) including FPICA, Economic Research Institute, Small Business Surveys, and Vigilant (formally Timber Operators Council) to name a few. Compensation and benefits, which include medical benefits, for each position were benchmarked through these surveys and data gathered from the Forestry Practices Industry Compensation Association. A market value rate has been established through a combination of wages plus benefits.</p> <p>The FME's Employee Handbook, provided to the auditors, has general information regarding all benefits. The Medical plan has changed slightly, to an HRA plan with higher deductible; the employer pays the first 50% of the deductible which can roll over year to year.</p> <p>The FME is committed to meeting or exceeding all applicable laws and/or regulations covering health and safety of employees and their families. The FME also has an Environmental Health and Safety Manager for all of their companies; however, the FME is in the process of hiring its</p>

		<p>own Safety Manager. Internal and external training was described to the auditors and records to date by course/meeting, date, and employee were provided. Key internal training activities documented for 2011 to date emphasized safety and health and included Standard Job Operating Procedures (SJOP); Haz Mat, Storm water; Injury and Illness Prevention Program (IIPP) incidents, required by CAL OSHA for all businesses with more than one employee; Emergency Evacuation Program (Evac) with one at each office site; Logging Safety; Summer Safety, Ticks, Heat, Vehicle; and STOP. For near misses reported on the "Hazard and Near Miss Hit Report Form" meetings are held once a month to discuss these incidences. If the "STOP Safety Observation Cycle Checklist is filled out by an employee the employee involved has a discussion with their immediate supervisor. The FME also developed a Fieldworker Training document to cover all issues related to safety and the use of herbicides for both employees and contractors.</p> <p>In on-site interviews with FME employees it was determined that they have the necessary safety equipment in their vehicles taken to the forest. Since the last audit, the FME has installed a new radio system (including better hand-held radios) which provides an enhanced capability to communicate from various locations on the property. This improvement has obvious safety implications.</p> <p>Safety incidences for employees were relatively minor in nature, illustrating that the FME is doing a good job complying with safety laws and regulations. Incident reports are kept in a folder in the main office in Ukiah, California. The FME's Executive Assistant in charge of filing these reports was interviewed and presented the incident report forms filled out since the last audit. One accident occurred when an employee was riding an ATV and was struck in the face by a large branch, knocking the employee off the vehicle. The employee suffered several cuts on the face and several broken bones. The employee was transported to a local hospital and treated and has undergone one further surgery to reconstruct parts of the nose. The employee has since returned to work. The only other incidents were related to minor first aid such as treatment for poison oak (n=4) and property damage where there were no injuries (n=2).</p>
<p>4.2.b. The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	<p>C</p>	<p>FME staff has focused on ensuring contractors meet required safety regulations. FME staff has begun completing annual safety inspections with loggers on the property. In on-site interviews with several Licensed Timber Operators (LTOs) it was determined that they have the necessary training and job site safety equipment. Pre-harvest meetings are held with</p>

		<p>contractors to address important safety issues such as fire prevention and safety.</p> <p>A copy of the “Independent Contractor Agreement” was provided to the auditors. An examination of this document revealed that it does indeed contain safety requirements and statements requiring contractors to follow all state and federal laws which include safety. The agreement makes reference to the document titled “Environmental, Health and Safety Practices for Contractors”. This document, given to every contractor, includes requirements such as obeying all laws and regulations, developing an IIPP, training forest workers, notifying the FME of safety incidences and visits from OSHA representatives, and having relevant personal protective equipment (PPE).</p> <p>Since the last audit, there was an addition to the contract agreement covering safety and fire inspections under “8. Logger Performance, (f) Logger Safety Inspection and Fire Prevention Inspection. Logger shall conduct operations under this contract in accordance with the requirements established by Company as described in Exhibit I---MRC Contractor Safety Inspection Checklist and Exhibit J---Fire Prevention Inspection Checklist.” It also now states that “Meeting these requirements is a high priority on every Company jobsite. Compliance of all applicable federal, state and local safety and fire prevention laws and regulations is the responsibility of the Logger. It is also the responsibility of the Logger to ensure that any subcontractor(s) are aware of all aspects of the Company’s requirements as described in this section. The Logger shall adhere to the highest standards of safety and fire protection to ensure that work performed is protective of both Logger and the Company’s natural resources. Logger’s failure to comply with safety and fire protection requirements whether as a result of purposeful acts, inattention, negligence or ignorance of the law may subject Logger to contract termination.”</p>
<p>4.2.c. The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	<p>C</p>	<p>The FME uses contractors that are LTOs as per the California Forest Practices Rules (CFPR). There is a state approved Timber Operator Education program, and the CFPR also recognizes “qualifying work experience” for LTOs. CFPR requires that LTOs comply with all CFPR provisions. For herbicide applications all crews need to have been trained within the last five years. Much of this training involves safety.</p> <p>Many of the FME’s contractors have a long history working on the land base, which is an indication that they are performing up to the standard, for both field work and safety compliance.</p>
<p>C4.3 The rights of workers to organize and voluntarily</p>		<p>Not evaluated</p>

<p>negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p>		
<p>C4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</p>	C	
<p>4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU; • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>	C	<p>The goal of the FME’s social impact analysis is to better understand these impacts and ensure they are addressed in the FMP. This social impact analysis will be reviewed every 5 years to determine if new social impacts are occurring that may need to be added into the forest management and planning process.</p> <p>As a result, the FME is continuing to address all issues related to the social impacts of its forest management activities. In doing so it also has provided a summary of its social impact results to the certification bodies. To cite briefly, they have undertaken a number of efforts in regard to social impacts which include assessing: (1) archaeological sites and cites of cultural, historical, and community significance (e.g., work with the Pinoleville Pomo Nation Tribe), (2) public resources such as air and water quality (e.g., through the THP process), (3) aesthetics (e.g., leaving buffers as observed in the audit field site visits), (4) community goals such as providing locals with direct employment and through the hiring of contractors, (5) the promotion of community economic opportunities (e.g., through the creation of various forest products, the provisioning of recreation and educational opportunities), and (6) attempting to develop positive relations with their neighbors (e.g., adjacent landowners from individual to ENGOs to other industries). For the last item there was confirmation gleaned from stakeholder interviews.</p> <p>In addition, the FME has begun work on the development and use of a Social Monitoring Concerns Matrix. This matrix summarizes a number of issues under the categories of economic (e.g., market access, use of local contractors, law enforcement relations), environmental (e.g., herbicides, air and water quality, water drafting), and public interest (e.g., noise, fire hazard, public access, safety). The FME has discussed the matrix with its managers and received informal feedback during public meetings. The FME acknowledges that additional consultations using the process as laid out in this matrix are needed with specific stakeholders (i.e., American Indian groups, watershed groups, forest contractors). Therefore, the understanding of social impacts is continuing and will be updated over time. While the FME tracks some</p>

		<p>basic data on local spending, community contributions, and local employment, it has not yet gathered data related to many matrix issues to fully understand baseline conditions and how that condition might change as a result of management activities. As this process progresses social impacts will be continually incorporated into forest management planning and operations.</p> <p>However, despite the above efforts, the issue of herbicide use is still of concern to certain communities near their land base and it was raised by many stakeholders consulted before and during the audit. When asked, the FME is willing to work with these stakeholders and has made overtures to them in the past. There have been a few public meetings given by the FME on this issue since the last audit. The main issue is the control of tanoak with herbicides, which in their view pollutes stream, leaves poisoned wood in the forest, and creates a fire hazard with all of the standing wood.</p> <p>Alternatives to herbicides considered by the FME such as cutting trees with chain saws is viewed by the FME as being more detrimental to the environment and worker safety and well-being since it requires multiple, intrusive entries into the forest due to chainsaw use, and associated fuel use, air quality issues, and ground compaction. This is viewed by the FME as more economically unfavorable. The FME has setup some experimental plots looking at the effects of using smaller dosages of herbicides. The FME sees tanoak removal as a forest restoration to redwoods and Douglas fir and this may eventually compliment their RSAs considerations. Tanoak has historically been a rather small component of the forest in region. Last, not all tanoak is being eliminated from the forest. It is scattered throughout the property, and included in RSAs and tribal areas of concern to name a few.</p> <p>Despite its efforts the FME to needs to revisit their approach to communicating and dealing with members of certain communities in terms of the issue surrounding the use, and the social and physical impacts to various populations and the land base of herbicide use. OBS 2011.1.</p>
<p>4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	<p>C</p>	<p>The FME has always approached local communities to gather inputs into their management through a series of public meetings, individuals participating in community or group activities, and by attempting to accommodate requests from the public. For example, the FME has made some positive inroads with the Pinoleville Pomo Nation Tribe. Also, the FME has responded to two local concerns regarding herbicide use in the Howard Creek and Dark Gulch areas of the property. In both cases, local residents requested a meeting with FME</p>

		management staff to address concerns related to its herbicide use. Staff attended two meetings in Westport and Dark Gulch. The FME is continuing to attempt to work with both groups to resolve concerns. The Dark Gulch group did participate in a local radio show shortly after their meeting with the FME (comments were generally not positive towards the FME's planned management). MRC intends to continue to attempt to work with this group to address their concerns.
4.4.c. People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.	C	<p>The FME has public meetings for THP public review and comment. The Forest Practice Rules require that Cal Fire have an open public review process. The FME does not generally implement these meetings, unless there is some directed questions and requests for such meetings (i.e., Dark Gulch group).</p> <p>In general, the FME goes well beyond the regulated THP process in alerting interested parties to forest management operations. Ample time is given for affected parties to voice concerns prior to any development activities taking place. The FME is required by CFPR to send out notices to downstream landowners when developing a THP as the CFPR (Public Resources Code, Section 1032.10) requires that, as a THP submitter, the FME must provide a notice by letter of proposed timber operations to all landowners within 1,000 feet downstream of a proposed THP boundary whose ownership adjoins or includes a Class I, II, or IV watercourse which receives surface drainage from proposed timber operations. A sample copy of this letter to an agency adjoin its property was provided to the auditor. For forest management operations such as harvesting a sample copy of a letter sent to an adjacent landowner by an FME forester and was provided to the auditors. The FME's internal policy is to send out written notices to landowners within 300' prior to completing any herbicide applications. However, this can be through actual meeting, phone conversation or written letter. Interviews with stakeholders have confirmed these notifications. In addition, stated policy in its FMP (p. 58) dictates that the FME complies with CFPR requirements for notification of local Native American tribes of project locations and notification of newly located sites for THPs.</p>
<p>4.4.d. For public forests, consultation shall include the following components:</p> <ol style="list-style-type: none"> 1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans; 2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management; 	NA	FME is a private entity.

<p>3. An accessible and affordable appeals process to planning decisions is available. Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>		
<p>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	C	
<p>4.5.a. The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>		Not evaluated
<p>4.5.b. The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>	NC	<p>FME's means for interested stakeholders to voice grievances and have them resolved does not fully conform to ISO/IEC 65 (FSC-STD-20-001 V3-0, 22) guidelines. FME maintains records of complaints and legal suites and claims. This is similar to a requirement for the MRC Family's FSC Chain-of-Custody certificates, although more specific to loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. CAR 2011.1.</p>
<p>4.5.c. Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.</p>		Not evaluated
<p>P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		
<p>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</p>	C	
<p>5.2.a. Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.</p>	C	<p>MRC uses local licensed timber operators (LTOs) for both ground-based and yarder operations. MRC has a deal with a local firewood harvester, who has not harvested much volume in recent years from the FMU. MRC is exploring product options for its Eucalyptus sites, which are to be restored to native forest composition. MRC's improved logging specifications ensure that harvested products go to the highest value product per log.</p>
<p>5.2.b. The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	C	<p>The FME continually seeks to optimize timber resources that could be harvested from the land base. According to its FMP (p. 59), it has put in place a program to deliver high quality logs to mills by and also minimizing wood or fiber losses. This focus on log quality and log specifications has markedly improved log quality since 2009. The FME has explored ways to market underutilized tree species from the forest such as</p>

		tanoak. In the past, it has attempted, although unsuccessfully, to produce tanoak flooring. Currently, the FME has engaged, through a lease, with a local citizen who has harvested firewood from the forest. Stakeholder outreach had indicated that this is not being done, and that they desire that tanoak be harvested for firewood. In a discussion with the FME and the business owner it was determined that he does indeed have an agreement with the FME and can harvest trees for firewood in sync with FME guidelines. OBS 2011.2
5.2.c. On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	NA	MRC is not a public entity.
C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.	C	
5.3.a. Management practices are employed to minimize the loss and/or waste of harvested forest products.	C	FME has recently updated its product utilization specifications and provided contractors with detailed cards so that they can make field decisions that result in fewer losses. For example, the new cards resulted in the contractor knowing to keep log lengths longer in the field so that the mill could make the decision as to what product a given log would go into.
5.3.b. Harvest practices are managed to protect residual trees and other forest resources, including: <ul style="list-style-type: none"> • soil compaction, rutting and erosion are minimized; • residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; • damage to NTFPs is minimized during management activities; and • techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible. 	C	During site visits to the Albion and Noyo tracts, the audit team observed much more use of slash on ground-based operations. Slash was used at the end of tail ditches and on the skid trails themselves to reduce compaction of soils, keep organic matter on site, and serve as a deterrent to unauthorized ATV use on-site. Disturbance to topsoil was minimal and limited to skid trails. No excessive rutting was observed. 'Rub' trees were designated at the convergence of skid trails and will be reused in subsequent harvests to protect other residual trees.
C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.	C	
5.4.a. The forest owner or manager demonstrates knowledge of their operation's effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.	C	As outlined in its FMP, the FME identifies and defines appropriate measures for maintaining and/or enhancing forest services and resources. Prime areas of concern are the production of quality logs (p. 59), exploring markets for alternative wood species, protecting watersheds, identifying and protecting wildlife and fisheries habitats, and providing access to the forest for a number of recreational and educational activities. The FME is also exploring the maintenance and development of non-timber revenue sources (p. 59). For example, it continues to lease land for hunting (p. 60) and minimal grazing as an additional income sources. Of potentially more significance is its exploration into the growing field for non-extractive "conservation" products.

		For example, the FME is currently researching and investing in pilot projects such as carbon offsets and conservation easements to further assess the potential of these innovative areas.
5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.	C	The FME provided the auditors with a list of products and services that it either has considered previously or is still researching based on its experiences as described in Indicator 5.4.a. Some products, such as tanoak flooring, have been abandoned as they were not break-even or profitable although the potential for using this species always exists. In some instances tanoak and other lesser used hardwood species are utilized for firewood production. Grazing leases are still maintained in some areas and markets for ecosystem services (e.g., carbon offsets) are being explored in others.
C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.		Not evaluated.
C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.	C	
<p>5.6.a. In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> • documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>	C	<p>An interview with the FME’s Inventory Manager provided an explanation on how inventory data is collected and used to calculate sustained yield harvest levels. Information is also found in the FME’s annual inventory report titled “State of the Inventory,” its FMP (pp. 1-13), and the web site (www.mrc.com).</p> <p>The FME’s Option A documents a clear rationale for a long-term sustainable yield from the forest. The use of individual modeling on 18 sustainability units strengthens the annual allowable cut (AAC) by ensuring that operational constraints are realistically reflected in its models, allowing for more conservative cutting limits compared to models that are applied over an entire ownership. Inventories are developed from a sampling scheme covering over 17, 000 stands. Each stand is assigned a vegetation label that forms the basis of a stratified sample. Sampling generates tree lists that are used to estimate inventories for all stands for many forest variables, such as volume, density, basal area, and habitat conditions.</p> <p>The FME regulates harvest levels on an area/volume check – going through the entire commercial land base on a 20 year cycle, so that approximately one fifth of the ownership (less reserve and protected areas) is harvested or minimally reviewed for harvest opportunities in each 5-year period. The current emphasis on harvesting under stocked stands in need of rehabilitation results in modeling demonstrating an increase in growth across the forest over time and thus the</p>

		<p>potential to increase the AAC over time. The AAC is calculated for each sustainability unit and then area regulation is applied to ensure that an excessive number of acres are not being treated to achieve the average AAC each planning period.</p> <p>MRC annually simulates growth and yield using CRYPTOS (Cooperative Redwood Yield Research Project). CRYPTOS 'grows' and estimates forest mortality for each tree in a tree list based on the tree species, crown canopy, and competition, as well as the site conditions in each stand. The FME also has 200 CFI (continuous forest inventory) plots used to model growth and mortality on the forest. Every 10 years a different set of plots are chosen.</p> <p>The modeled harvest levels are constrained by numerous factors such as: stream protection zones; rare, threatened, and endangered (RT&E) species protection at various protected special sites such as reserve areas; as well as the specific silvicultural prescriptions and desired future condition prescribed by the FME.</p>
<p>5.6.b. Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	<p>C</p>	<p>In an interview with the Inventory Manager and based on documentation reviewed and numbers reported in its FMP, the auditors concluded that annual harvest levels are not exceeding growth on the forest from year to year.</p> <p>Summary of 2010 harvest: 2010 harvest – 39 mmbf, 2011 planned harvest 29 mmbf.</p> <p>1st period allowable harvest (2007-2010, 4 years only) total 246,413 bf; average annual allowable = 61.6 mmbf</p> <p>2nd period allowable harvest (2011-2015) total 344,437 bf, average annual allowable = 68.9 mmbf.</p> <p>2010/2011 planned harvests well within allowable limits.</p>
<p>5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	<p>C</p>	<p>The FME inherited forest lands that had been substantially high-graded under previous ownerships. Part of the FME's core forest management goals is to rehabilitate these stands and restore them to natural stocking levels and species composition. There is currently an overabundance of hardwoods (e.g., tanoak) relative to historical stand conditions prior to the high grading practice of previous landowners. All timber management planning is undertaken with the goals of achieving desired conditions and improving or maintaining the health and quality of the forest within the FMU. Silviculture prescriptions are applied to most quickly return the forest to the desired future state as articulated in their Management Plan and Option A. In field observations by the auditors confirmed that these actions are indeed taking place.</p>

<p>5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>	<p>NA</p>	<p>MRC does not harvest a significant amount of commercially viable NTFPs. A small collector pays a fee to collect boughs and other vegetative material within the Navarro East block for use in holiday boughs and flower arrangements, but this does not qualify as a commercially significant operation.</p>
<p>P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</p>		
<p>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p>	<p>C</p>	
<p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>C</p>	<p>The following surveys have occurred this year:</p> <ul style="list-style-type: none"> • Northern Spotted Owl (NSO) – annual spring summer surveys, THPs, territory monitoring for productivity • Marbled murrelet – radar surveys in Alder Creek , Big River drainage, ground surveys – Gulch 5, Russell Brook • Sensitive amphibian species • Redd surveys for coho, electrofishing for fish distribution • Plant surveys <p>NSOs receive new/changed core areas every year depending on where the NSO is located. All other conservation areas remain the same.</p> <p>Forest Science staff, which includes wildlife and aquatic/hydrology technicians, presented the SCS/SW audit team with a report on its 2011 activities and another on NSO occupancy and reproductive patterns. Current aquatic RTE projects include coastal tailed frog population genetic study with UC Merced; Salmonid monitoring, red-legged frog breeding site occupancy monitoring, and amphibian distribution. Wildlife staff is monitoring NSO breeding and site occupancy, as well the population of the barred owl (including nearness to NSO sites).</p>
<p>6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the</p>	<p>C</p>	<p>Timber harvests adjacent to NSO core areas are fairly typical on MRC. NSO core areas, also known as 'owl circles,' are delineated prior to harvests and monitored throughout harvests to protect its integrity. MRC staff includes several well qualified biologists in addition to the contract biologists utilized to conduct RTE surveys. Interviews indicate consistent implementation of all federally required surveys prior to</p>

short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.		harvesting. Protected areas and conservation zones are included on maps and in the geographic information system (GIS) database for future monitoring purposes.
6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.	NA	FME is not a public entity.
6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	All these activities that the FME is aware of were authorized and provided adequate protection to RT&E species, habitats, and plant communities. The FME works to ensure protection of the FMU via gating access and utilizing a security staff. During the field visits, the auditor noted that hunting, gathering, fishing, and related activities are not much of a threat on the FMU. Clandestine marijuana gardens, however, may threaten forest or plant community regeneration and water quality/quantity. The FME aggressively pursues eradication of these gardens to protect and restore forest resources. This was confirmed through staff interviews and information on annual detection and eradications.
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	
C6.3.a. Landscape-scale indicators	C	
6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	The FME continues to grow and develop late seral redwood forest stands in its Aquatic Management Zones (AMZ) zones, NSO protection zones, and the LACMA area. The FME has also designated "hardwood representative sample areas" to protect early successional hardwood and conifer/hardwood stands from treatment – allowing them to develop in a more natural state. Young growth stands and medium-aged conifer stands are well-represented on the landscape and based on the FME's landscape models will continue to be well-represented in the future.
6.3.a.2. When a rare ecological community is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.		Examples of protecting rare ecological communities include the protection of the oak woodlands forest type. These areas are protected from harvesting, and management actions are only permitted if they enhance the viability of the community type, such as removing conifer encroachment into oak woodlands. MRC is examining options for surrogates to fire, such as grazing.
6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth . Type 1 and 2 old growth are also	C	No management activities have occurred near old growth stands in 2011.

<p>protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		<p>MRC also has a formal old-growth policy that protects all individual old-growth redwood, Douglas-fir and tanoak within individual stands. The policy provides for large trees exceeding diameter specification that were established prior to 1800 as restricted from harvesting. Additionally, neighboring trees with comingled branches are also reserved from harvest in order to provide a buffer for the individual Type 2 old-growth trees. Evidence of marking trees according to the policy was observed in harvest units.</p> <p>All old growth stands, both individual trees and stands, are mapped and designated as HCVF, However all stands would be screened prior to any activity in those remote areas.</p>
<p>6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>C</p>	<p>Habitat enhancement/restoration activities include:</p> <ul style="list-style-type: none"> - Removing young Douglas-fir from potential oak woodland area in conjunction with Pinoleville Pomo Nation (on our forestlands) - Upgrading bridges to control sediment on John Smith Creek - Cottoneva Phase I and II restoration – Rockport tract, decommissioning historic roads and fixing existing roads. <p>Road and stream crossing upgrades are consistent with</p>

		<p>improving Salmonid and amphibian habitat and passage. Removal of young Douglas-fir from oak woodlands removes threats to oak suppression. The oak woodland contains Oregon white oak, which is lower in tannin content than tanoak and some other true oaks and thus more digestible by some wildlife species.</p> <p>MRC has designated NSO and MM habitat areas throughout the ownership. There are special management zones for the Point Arena Mountain Beaver and California red-legged frog. These and other species are described in the FMP.</p>
<p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 	C	<p>Virtually all timber harvest plans have creek or stream crossings or have areas adjacent to an AMZ zone. Vegetation management activities are generally limited to outside the AMZ. Where harvesting occurs, canopy retention of 50-80% is required per California FPR. As MRC has limited harvesting in these areas, larger trees and CWD are expected to develop over time, thus contributing to shading, wood and leaf litter, Salmonid and amphibian habitat, cover and travel corridors, and in-stream breeding areas.</p>
<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	<p>The primary focus of MRC's management is to restore the landscape to a more natural mix of tree species with the primary focus being to reduce the percentage of tanoak across the landscape and increase the percentage of redwood and Douglas-fir. This desired future condition is in line with the historical condition on the forest prior to the property wide harvesting of late successional redwood forests which was conducted without ensuring timely and sufficient conifer regeneration.</p>
<p>6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	C	<p>MRC used Douglas-fir seed from local seed zone this year. Redwood cultivars were used from HRC, MRC, and Soper Wheeler coastal. Redwood seed is from local seed zone. MRC maintains a hedge farm to cultivate redwood material of known provenance. Site conditions and phenotypic traits of hedge farm trees are documented and used to make decisions on what sites to plant artificial regeneration.</p>
<p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. 	C	<p>MRC policy requires that 3 snags or legacy trees per acre (averaged over the harvest block) be marked for retention. The landscape is deficient in older soft snags and often the marking includes either legacy trees or live trees to be recruited as either snags or legacy trees. Every unit visited was observed to meet or exceed the 3 per acre requirement.</p> <p>Additionally the 25,000 acres of steam zones and the other reserve areas significantly contribute to items discussed in</p>

<p>Trees selected for retention are generally representative of the dominant species found on the site.</p>		<p>Indicators 6.3.a and b.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>	<p>C</p>	<p>Even-aged harvests this year were limited to seed tree removals. Cal-Fire does not consider Variable Retention (VR) as even-aged, but some harvests also contained VR silviculture in 2011. No problems detected with meeting wildlife tree or downed wood retention objectives detected in these units.</p> <p>The variable retention units (even-aged harvests) observed included reserve (retention) patches that were representative of the stand and individual trees of conifer and hardwood. On the Noyo tract, group retention of some hardwood areas allows for understory shrubs and herbaceous plants to remain onsite and untreated by post-harvest hardwood control. Retention was consistently 10% or more of the harvest unit. The hardwood retention across the typical variable retention is 15 sq.ft/ac, which is typically 25% of the tanoak canopy. This does not include retention of hardwood and conifer trees in AMZs. On the Noyo 20 sq.ft/ac of tanoak was retained, which is above what is required by the retention standard set in the FMP. The conifer retention retains approximately 20% of pre-harvest conifer basal area. Considering the addition of the SMZ retention across the landscape as well as the selection and group selection harvesting across the landscape, the retention easily met the 10%+ required by the standard.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 	<p>NA</p>	<p>The FME is well under the current opening sizes allowed under FSC-US Pacific Coast Guidelines.</p>
<p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a</p>	<p>C</p>	<p>Invasive species treatment was limited to Pampas grass and French broom (spray with glyphosate) in Big River this year.</p>

<p>strategy to prevent or control <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 		<p>MRC developed an invasive species management plan and most wanted invasive species report form. Implemented in late July of 2011, GIS feature in development to track all known occurrences, follow-up actions, and results.</p> <p>MRC has objectives for invasive species management, which include eradication or reduction of cover, biomass and distribution of targeted non-native invasive plants, and to reduce the number and distribution of non-native invasive animals (e.g., wild boar) if they threaten ecological balance in natural communities. MRC includes in the plan methods to determine the extent of invasive species (1), degree of threat to native species and ecosystems (with emphasis on threats to HCVs/RSAs; 1), Management practices to reduce spread or control invasives (2 & 3), and monitoring (4). SCS/SW observed the initial GIS tool on the reforestation forester's computer. Although the tool is still being developed, it has data to show the extent of prioritized invasive species on parts of the FMU where there are active operations.</p>
<p>6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	C	<p>Slash piles were burned this winter to reduce fire risk. Ongoing maintenance and opening of key fire roads to maintain access. One fire has occurred on the FMU in the Noyo tract, this fire appears to be part of a confluence of fires started by an arsonist who remains at large and is still lighting fires in the Willits and Noyo area.</p>
<p>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	C	
<p>6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) <i>GAP analyses</i>; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p>	C	<p>See p.p. 31-42 for the description of the HCV and RSA assessments. Ecosystems that naturally occur on the FMU have been documented in the FMP. These ecosystems have been identified through collaboration with state and federal agencies, local and national NGOs, consultation with Humboldt Redwood Company's (HRC) staff botanist, and local stakeholders. MRC also relied on aerial photos and forest inventory data to classify areas. MRC has documented other known HCVs and RSAs in the area (see table beginning on p. 33 of FMP).</p>
<p>6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose</p>	C	<p>MRC has classified several RSAs on its property in response to its analysis of other known reserves and successional stages of certain ecosystems that occur in the area. For example, hardwood RSAs have been established on soils that historically</p>

properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes. Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.		supported hardwood species as the dominant tree cover. Natural grasslands, which may represent early successional habitat for some wildlife, are classified as RSA.
6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances: a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.	C	MRC describes management activities in the FMP that are compatible with the protection of RSAs, such as harvesting only to maintain relative proportion of hardwoods to conifers in hardwood RSAs and maintenance of a mixed-age stand of hardwoods, representative of an early seral hardwood stand. Other RSAs and management activities are described in the FMP. Other management activities, such as road building, will be avoided in RSAs where possible.
6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.	C	MRC updated its RSA assessment in response to the 2010 recertification assessment.
6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.	NA	MRC is not a public forest.
C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.	C	
6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.	C	The CFPR provide written guidelines. THP's contain specific language related to mitigation of erosion. The FME has a specific policy in the FMP for unstable areas or areas at risk of landslide, and the Option A provides further guidelines.
6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.	C	There are no BMPs in California, however the Forest Practice Rules have become the <i>de facto</i> BMPs for the state, and MRC is in compliance with the FPR.
6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed: <ul style="list-style-type: none">• Slash is concentrated only as much as necessary to achieve the goals of site preparation and the	C	During site visits to the Albion and Noyo tracts, SCS/SW observed much more use of slash on ground-based operations. Slash was used at the end of tail ditches and on the skid trails themselves to reduce compaction of soils and keep organic matter on site. Disturbance to topsoil was minimal and limited to skid trails. No excessive rutting was observed. Whole-tree harvesting is not conducted. All logging slash remains on the harvest site in bum landing piles or for use in

<p>reduction of fuels to moderate or low levels of fire hazard.</p> <ul style="list-style-type: none"> • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where appropriate. 		<p>skid trails and drainage structures (i.e., at the end of tail ditches). Remnant slash from limbing and bucking in burned during the winter if it is not used to cover up more skid trails or used in drainage structures.</p> <p>The most impactful equipment, cable and grapple skidders, are used only where slopes are not excessive. Otherwise, MRC uses cable yarding and occasionally helicopter logging to harvest trees.</p>
<p>6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 	C	<p>In, 2011, MRC has been making progress on its road crossing upgrades and stream channel restoration program. Where possible, the move from waterbars to rolling dips is being conducted on main and secondary haul roads to reduce sediment discharge to streams. The move to either larger culverts or replacement of culverts with bridges allows for free passage of aquatic organisms. Field observations were made on several of these projects.</p> <p>Access to MRC lands are gated and its security staff and foresters regularly patrol open harvest roads to control access as to avoid disturbing wildlife as much as possible.</p> <p>MRC's objective of having a road system that is big enough to access management units for monitoring and harvesting, but small enough to avoid unnecessary expense, is compatible with reducing impacts to wildlife and fragmentation.</p>
<p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written Streamside Management Zone (SMZ) buffer management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific</p>	C	<p>See response to CAR 2010.7.</p> <p>After comparing the audit team's stream buffer analysis of the FSC-US Pacific Coast vs. CFPR to the FME's own analysis of its stream buffer management practices vs. FSC-US Pacific Coast guidelines, the auditors found that the FME's updated stream buffer widths and permitted forest management practices are in compliance with the restrictions detailed in the FSC-US Pacific Coast regional stream buffer guidelines. Foresters have a new card with the information on updated SMZ widths and permitted management activities within each stream class.</p>

Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.		
6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.	NA	See response to CAR 2010.7 . MRC has opted to use SMZ widths and management restrictions that are compatible with FSC US Pacific Coast regional guidelines.
6.5.f. Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of aquatic habitat . Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.	C	The FME is actively reducing the number of stream impediments and road crossings through large capital improvement programs and grant projects, including bridge removal and replacement, road and ford rocking, and channel stabilization. Field observations by the auditors viewed this work.
6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.	C	Recreational use of MRC land is limited due to the permit system and recreational access permits are granted if there is risk of negative environmental impacts.
6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.	C	MRC's currently maintains two limited grazing leases, although most of our previous leases were terminated due to difficulties managing cattle (i.e., entering unauthorized areas). The two current leases in Elk and the Fasheur Ranch are managed with a very proactive rancher who works hard to make sure he follows MRC policies, which includes limiting cattle's access to riparian areas.
C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.		Not evaluated.

C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	
6.7.a. The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	All contractors inspected during the 2011 evaluation had spill kits on site and knew the proper chain of command to report spills. Workers were able to explain the process of cleanup and disposal, including disposal of material impacted by spills of over a certain size.
6.7.b. In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	Contractors interviewed during the 2011 evaluation had experience no spills this logging season. MRC confirmed this. Workers interviewed were able to explain the appropriate procedures to follow as required by law and MRC policy.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	MRC and its contractors store lubricants and fuels in designated storage areas in leak-proof containers away from ecologically sensitive features. The road management garages on MRC's property had containers designated for used lubricant disposal, which are then transported offsite for disposal and/or reprocessing.
C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.		Not evaluated.
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	Straw may be used for erosion protection on road restoration sites. THPs require the use of barley straw (non-invasive), other non-THP road restoration may include other straws but these are non-invasive in the redwood region as well. Where possible, foresters and road project manager will use slash rather than straw to protect erosion sites. This type of erosion protection also prevents MRC's most wanted exotics (such as pampass grass and broom) from seeding into the recently opened area.
6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	C	Monitoring occurs on a case by case basis (dependent on risk). Restoration sites are visited often in the following years to assess whether creeks are behaving as expected and ensure no further sediment has been lost. This follow-up also includes reviewing mulched areas.
6.9.c. The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	C	There have been no detected adverse impacts resulting from MRC's use of exotic grass seed or straw.
C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:	C	

<p>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>		
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>MRC converted one forested area of 8 acres to a hedge farm, which meets the FSC definition of a non-forest use and amounts to significantly less than 1% of the ownership. This area was previously managed as a natural forest under a THP.</p>
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>The hedge farm area has been mapped and compared to MRC’s HCV/RSA mapping efforts – it is outside of all HCV/RSAs. See map in response to CAR 2010.9.</p>
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	C	<p>The hedge farm location provides the following clear, substantial, additional, secure, long-term conservation benefits across the forest unit:</p> <ul style="list-style-type: none"> • Provides a secure source of seedling material for redwoods for all seed zones across our forestlands (redwood seeding is rare in this region of California and seed is limited in quantity and quality) • Ensure a viable stock of seedling production for conducting forest restoration activities (specifically restoring conifer forests across the landscape) • Provides a source of seedlings that are “superior trees” and enable better survival and faster growth (thus insuring stable growth and yield over the life of the forest)
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	C	<p>As per guidance from FSC-US, the hedge farm meets the FSC definition of a non-forest use as the hedge farm’s function is to provide local sources of genetic material for reforestation in non-mast years and to treat under-stocked stands. This is consistent with the concept of sustaining long-term benefits across the FMU. The trees in the hedge farm are not managed for timber or fiber production and no fertilizers are used. Harvesting is limited to individual rows rather than large harvest blocks. Thus, this does not qualify as conversion to a plantation.</p>
<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	C	<p>Ecological values and functions have been maintained intact across the forestlands. In fact, this hedge farm is a required component of our long-term management in order to ensure appropriate forest regeneration after restoration activities occur. Forest succession will continue in all areas outside of the hedge farm as described in our management plan. Genetic, species, and ecosystem diversity needs are met by allowing redwood sprouts to grow from stumps and interplanting the area around the stumps with these cultivars. Natural cycles that affect the productivity of the ecosystem such as decomposition, growth, maintenance of downed</p>

		<p>wood and snags throughout MRC's forestlands are still ongoing and allowed to progress. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p> <p>MRC has updated the FMP to discuss the 7-acre hedge farm area as required by indicator 6.10.e. The hedge farm serves as an area for MRC to propagate local genetic stock for restoration of conifer across its ownership, which is consistent with criterion 6.3 since past land practices have led to degradation of conifer forests. Interviews with MRC's reforestation forester indicate his understanding of different phenotypes adapted to various site conditions. Each provenance is documented, and traits and responses to cutting are observed in the hedge farm.</p>
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	<p>NA</p>	<p>MRC does not hold any subsurface oil, mineral or gas (OGM) rights to their property. There are no sites of OGM development. Any potential future OGM development by subsurface estate owners would have to be report to both SCS and SW.</p>
<p>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p>		
<p>C7.1. The management plan and supporting documents shall provide:</p> <p>a) Management objectives. b) description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</p> <p>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</p> <p>d) Rationale for rate of annual harvest and species selection. e) Provisions for monitoring of forest growth and dynamics. f) Environmental safeguards based on environmental assessments. g) Plans for the identification and protection of rare, threatened and endangered species.</p> <p>h) Maps describing the forest resource base including</p>	<p>C</p>	

<p>protected areas, planned management activities and land ownership.</p> <p>i) Description and justification of harvesting techniques and equipment to be used.</p>		
<p>7.1.a. The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	C	<p>The FMP states that MRC is an LLC. The FMP makes brief mention of conservation easements and right-of-way easements held by others. This information can be supplemented with documentation specific to each easement available at MRC offices. Forest and other natural resources are described throughout the plan.</p>
<p>7.1.b. The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>	C	<p>History of management is on p.p. 3-5 of the FMP. Each sustainability unit also has its site conditions, past management activities, and conservation zones. The FMP includes a section on "Inventory of Conifer Trees," that details forest types, size classes, and natural disturbance regimes.</p>
<p>7.1.c. The management plan describes:</p> <p>a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p>	C	<p>The following sections of the FMP address this requirement: Inventory of Conifer Trees, Terrestrial Wildlife Species and Habitat, Aquatic Wildlife Species and Habitat, and Species Composition. Objectives are included in the introduction pages of the FMP. Each of the four sections of the FMP mention activities to achieve desired future conditions.</p>
<p>7.1.d. The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.</p>	C	<p>The FMP includes a description of landscape in the history section and in the landscape planning section. Landscape-scale habitat elements are covered in Inventory of Conifer Trees, Terrestrial Wildlife Species and Habitat, and Aquatic Wildlife Species and Habitat.</p>
<p>7.1.e. The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p> <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); • Other special management areas. 	C	<p>The FMP includes a description of the following resources and outlines activities to conserve and/or protect RTE species, plant species and community diversity, water resources, and HCV/RSA zones (see Terrestrial Wildlife Species and Habitat, and Aquatic Wildlife Species and Habitat). Soil resources are described throughout the plan. Site indexes for all sustainability units are documented in MRC offices and based on soil qualities.</p>
<p>7.1.f. If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).</p>	C	<p>The FMP contains a section called "Invasive species management and monitoring" that fulfills this requirement. For example, MRC has documented a prioritized list of invasives to control. MRC also has GIS database and other documentation on its servers than lend support to this indicator. For example, the extent of invasive species is being tracked in GIS.</p>
<p>7.1.g. The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and 6.8).</p>	C	<p>Sudden Oak Death (SOD) is described in the FMP and that MRC will follow state/federal guidelines on it. Old growth stands of Douglas-fir may be affected by insect outbreaks. Redwood forests are rarely affected by pests or pathogens. In</p>

		addition to SOD, the Fire Prevention and Protection section of the FMP addresses forest health issues.
7.1.h. If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.	C	MRC addresses herbicide use throughout the FMP. There is an Herbicide Use Policy and Herbicide Use Stand Characterization. The FMP includes imazapyr, but MRC uses other chemicals that are described in other management planning documentation (e.g., glyphosate).
7.1.i. If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.	NA	MRC does not use biological control.
7.1.j. The management plan incorporates the results of the evaluation of social impacts, including: <ul style="list-style-type: none"> • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g). 	C	<p>The FMP includes a basic description of other use rights, such as rights of way, that are maintained in files at MRC offices. MRC has documented in the FMP important community issues, such as neighbor notification, recreation, and archaeological sites. Archaeological sites are kept on GIS and reviewed during the THP planning phase. MRC has a policy on interaction with Native American Tribes. MRC tracks its donations to local community organizations and events.</p> <p>MRC addresses all bullet points of indicator 4.4.a in its analysis and has provided a summary of its social impact results to the certification bodies in CAR 2010.3. In conducting the assessment, MRC relied on information from staff and research necessary to respond to other CARs/OBSs, such as CAR 2010.4. Interviews with stakeholders show that MRC is considering their input in the assessment of social impacts, such as initiating a literature search on alternative tanoak controls.</p> <p>See also MRC's response to CAR 2010.4, which addressing impacts to the local economy.</p>
7.1.k. The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	C	The FMP contains a sub-section on road improvements in the Aquatic Wildlife Species and Habitat sections. Road surveys and Road Policy are also described. Roads are addressed in other parts of the FMP and include the purpose, condition and maintenance.
7.1.l. The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.	C	See sub-section on Silviculture in the Inventory of Conifer Trees section. Individual THPs also include descriptions of silvicultural systems.
7.1.m. The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	C	See the Inventory of Conifer Trees section, as well as Appendix A, of the FMP.
7.1.n. The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	C	See the Monitoring and Responding to Changed Circumstances section of the FMP. Monitoring is also documented as part of completion of THPs, forest inventory, and Terrestrial Wildlife Species & Habitat.
7.1.o. The management plan includes maps describing the resource base, the characteristics of general management	C	MRC has maps included as part of every THP and has GIS with multivariable capabilities, which allows it to make customized

zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.		maps for certain management activities.
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.	C	This is required as part of the California THP process. Logging methods are also described on p. 49 of the FMP.
7.1.q. Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.	C	THPs are required to initiate a harvest on industrial forestlands in the State of California. They must include a description of the activities and the desired future conditions, as well as environmental protections. THPs also include maps. Health and safety is addressed in timber harvest and pesticide application contracts. A prescription is also prepared for herbicide applications as part of the contract.
7.1.r. The management plan describes the stakeholder consultation process.	C	MRC added the Community input policy on p. 56 of the FMP in response to CAR 2010.10.
C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	C	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	C	The FMP was updated in 2011 in response to many 2010 CARs and OBSs.
C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a. Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	<p>MRC does provide guidance and training to forest workers to assist them in implementing harvest plans, and workers demonstrate knowledge about wildlife trees, archeological sites, and WLPZ. Area foresters' understanding and knowledge of their management area and harvest units is excellent.</p> <p>All logging contractors observed during the evaluation were making use of appropriate PPE and had First AID kits, spill kits, fire boxes, and fire extinguishers on site. Contractors interviewed said that MRC foresters have been completing site inspections and maintain communication with them throughout the week. Additionally, one logging contractor interviewed was coming to the job site to inspect the log specifications and observe his workers. He was aware of all of his employees' level of job and safety training, such as two new employees' need for First AID/CPR certification within the next few months. See also comments on OBS 2010.2 and</p>

		2010.3.
C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a. While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	C	The FME and its sister company, HRC, use the web site to provide public version of FMPs, monitoring results, and other items. The FME's public summary of its FMP is dated 2010, while its new FMP is dated 2011. Last year, the FME's only non-conformance in regards to FMP content was its stakeholder consultation process. Indicator 7.4.a requires the following: "While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee." OBS 2011.3
7.4.b. Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.	NA	MRC is not a public forest.
<p>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	For 2010, approximately 39 mmbf was harvested. For 2011, 29 mmbf is planned. There has been ongoing inventory sampling, and aerial photos were taken for a little less than half of the property to aid in inventory analysis. Fire plots were visited to follow-up on growth rates of redwood in burned areas.
8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	Unanticipated loss of forest resources is monitored and recorded, such as loss due to landslides or fire. All salvage operations in response to the 2008 fires have been completed. No other significant, unanticipated removal or loss has occurred.
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	Timber harvest volumes are tracked via a truck ticket and log accounting system that includes scaling each log. Thus, the monitoring of harvest volumes is very accurate in order to provide the information needed to evaluate Criterion 5.6.as

		per THP requirements and through MRC's Option A calculated harvest levels. No NTFPs are commercially harvested on MRC land.
<p>8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their <i>habitats</i>; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4). 	C	<p>Inventory is used as the basis for monitoring wildlife and plant communities. Tom B. has been doing extensive on the ground reconnaissance of MRC's HCV/RSA designations to insure appropriate typing (i.e. pygmy forest versus bishop pine).</p> <p>Rare, threatened and endangered species populations are regularly monitored as part of each timber sale planning, with an emphasis on spotted owl, marbled murrelet, red legged frog, and Point Arena mountain beaver. Habitat monitoring is included in such surveys, particularly aquatic habitat, as part of MRC's watershed analysis work. Rare plants are monitored through botanical surveys and protected areas and unique habitat types are monitored by area foresters, who are intimately familiar with their harvest units. Invasive species locations are monitored and assessed primarily via the area forester's knowledge of specific problem areas.</p> <p>The location data for RTE species is updated from the state annually.</p>
<p>8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	C	<p>For environmental impacts monitored, see MRC's website. Aquatic conditions, forest inventory, forest and road restoration, rare plants, and terrestrial wildlife are reported on. The last public annual report on aquatic biology of from 2009.</p> <p>Interviews with employees and contractors indicate that area foresters are on site 1-2 days per week during active logging and the logging supervisor is on site 2-4 days per week during active logging. Field inspection sheets documenting these inspections and contractor interviews confirmed the frequency of the inspections.</p>
<p>8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	C	<p>In addition to the informal but regular monitoring conducted by the area foresters and their staff, a significant effort to identify mitigation measures such as road rocking and road decommission is on-going. Evidence of this effort was provided via interviews with MRC staff.</p>
<p>8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).</p>	C	<p>The FME monitors its harvesting activities through the implementation of its THP. Analyses of the success of these plans provide the FME with an indication of its impacts on the forest and local communities. The FME has documented its impacts on the local economy, through its provision of raw materials to mills, and the employment it provides both directly in its operations and indirectly from those who support their operations, and through household expenditures in the region from forest workers.</p>

		The FME also purchases materials and equipment from the region, whenever it is feasible to do so. Given the rural nature of this area, it is a strong contributor to local economies.
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	NC	The FME has begun work on the development and use of a Social Monitoring Concerns Matrix which is being utilized to gather stakeholder responses for monitoring issues of concern. See also Indicator 4.5.b. See CAR 2011.1 .
8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	<p>The FME has made concerted efforts to reach out to both federally recognized and non-recognized tribal concerns and has had some success working together with certain tribes. The best illustration of this is their interactions with the Pineville Pomo Nation Tribe where the FME works with the tribe to protect key resources such as tanoak groves, oak woodlands, and areas with concentrations of basket-weaving materials. The FME is engaging in ongoing monitoring of its co-management sites with the Pinoleville Pomo Nation.</p> <p>On note, the Stewardship Director has offered an opportunity for engagement to all attendees at a February 2011 meeting of the Mendocino-Sonoma Tribal Environmental Programs Group. Some progress has been made as the FME has begun to work with a local basket weaver on potential locations for sedge collections. An FME representative has already asked to attend a meeting every year of the Mendocino-Sonoma Tribal Environmental Programs Group to ensure this opportunity for joint monitoring of sites of cultural significance continues to become more of a reality.</p>
8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	As stated in its FMP, the FME monitors revenues and expenses through finely detailed and elaborate accounting systems. Such records are available as needed for auditing purposes, and several documents were shared with the auditors to confirm that this is being done. As stated by its President, the FME does a continual review of costs involved with the business. One recent development is the implementation of their log quality control plan. By determining a more appropriate size for logs to be cut in the woods the FME has increased productivity, efficiency, utilization, and quality both in the forest with contractors, and at its mill.
C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	C	
8.3.a. When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	The FME has a Documented Control System protocol that ensures there will be no mixing of non FSC-certified and FSC-certified forest products prior to the forest gate, which is the mill site. Each load of logs from the FME's forest is accompanied by a 4-ply truck trip ticket that provides an identification of FSC-certified materials. Trip tickets also contain the source code for the area logged and who logged it.

		This information is delivered to the forest gate. Also, there is no outsourcing of materials prior to its delivery at the mill.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	Each load of logs from the FME's forest is accompanied by a 4-ply truck trip ticket that provides an identification of FSC-certified materials. Trip tickets contain the source code for the area logged and who logged it. This information is delivered to the forest gate. Information from the mill is sent back to the main office where it is documented in their accounting system to enable the FME to track all harvested materials on the forest.

P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.

High Conservation Value Forests are those that possess one or more of the following attributes:

- a) **Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or 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**
- b) **Forest areas that are in or contain rare, threatened or endangered ecosystems**
- c) **Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)**
- d) **Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).**

Examples of forest areas that *may have* high conservation value attributes include, but are not limited to:

Central Hardwoods:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >160 years old (a)
- Municipal watersheds –headwaters, reservoirs (c)
- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern (b)

<p>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>		
<p>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.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	C	<p>The FME has determined a number of RSAs and High Conservation Values (HCV) areas, and has differentiated between HCV areas and RSAs where warranted in the management plan and associated maps. Both RSAs and HCVs have protections and management strategies based on the ecological characteristics of them. For example, oak woodlands may require removal of conifer encroachment or actions that mimic the effects of natural ground fires. Certain areas, such those for the Point Arena Mountain Beaver and Marbled Murrelet, may require more explanation as to the RSA over the HCV designation as the FSC-US HCV framework is clear that RTE species are HCV. It is clear, however, that MRC has included maintenance and/or enhancement options for these species and thus meets the intent of the indicator.</p> <p>The FME initiated consultation with some local tribal representatives on identifying HCVs. In the meantime, the FME is waiting for tribes to respond to its first consultation.</p> <p>OBS 2011.4</p>
<p>9.1.b. In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.</p>	C	<p>MRC consulted with many experts, specialists, and local community members during the assessment. State and federal agencies, local and national NGOs, and community members had input. MRC holds an annual public meeting to discuss stakeholder issues, including HCVs and RSAs.</p>
<p>9.1.c. A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.</p>	C	<p>The updated FMP includes a section on RSA and HCV classification and describes the results of the assessment and the management strategies for their maintenance and enhancement.</p>
<p>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	C	
<p>9.2.a. The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.</p>	C	<p>MRC utilized its consultation process to address both the question of location and attributes of HCV as well as identifying their type and management prescriptions/options for the maintenance of their HCV attributes. MRC utilized local expertise as much as possible, but also utilized one forest advisor from Humboldt County who worked as a certifier prior to working for the Cooperative Extension (Y. Valachovic). Note the table in response to CAR 2010.6 that describes the stakeholder/experts queried related to each individual type.</p>
<p>9.2.b. On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.</p>	NA	<p>MRC is not a public forest.</p>

<p>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	<p>C</p>	
<p>9.3.a. The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	<p>C</p>	<p>The FMP describes HCVs and measures necessary to ensure their maintenance and/or enhancement of HCVs identified. See the descriptions of each HCV identified and the management measures in the FMP. For example, for oak woodland MRC has options for the following management prescriptions:</p> <p>“Avoid conducting management activities in oak woodlands if feasible. Management activities to allow access to adjacent timber stands will occur only if no other routes are feasible. Seek opportunities to apply surrogates for natural disturbance agents (e.g. fire) within oak woodland areas. Decommission, close, and re-vegetate historic roads. Harvest encroaching Douglas-fir and avoid replanting the harvested area with conifers if feasible and cost-efficient.”</p>
<p>9.3.b. All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>	<p>C</p>	<p>All management activities described in the FMP and implemented in the field are compatible with the maintenance and/or enhancement of HCVs. For example, stream crossing upgrades have removed impediments to anadromous fish passage and opened up previously accessible habitat. In marbled murrelet areas, harvesting is only allowed where it will accelerate the development of old growth conditions.</p>
<p>9.3.c. If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.</p>	<p>C</p>	<p>Many of MRC lands have adjacent landowners where ownership may change hands. Typically, its relationship with adjacent landowners is positive and cooperative. For instance, MRC has attempted to work with watershed councils (made up of many different landowners and interested parties) in cooperative fashion to insure streams that are currently occupied by coho can continue to be occupied by coho in the future.</p> <p>MRC staff continues to monitor its HCV and RSA stands on the FMU, and especially those with adjacent forest landowners to ensure those stands maintain their habitat typing. Additionally, MRC has provided additional protections for the Navarro River Redwoods State Park (a second growth stand of floodplain redwood) and Henny Woods State Park (contains a Type I old growth stand) both of which area adjacent to the FMU.</p> <p>MRC tends to work well with adjacent state park forestlands as they share an interest the conservation of Northern</p>

		Spotted Owl (NSO; owl circles may cross into state park forestlands). MRC has a relationship with a local family on NSO conservation. Point Arena Mountain Beaver burrow areas can also be shared. State and Federal regulations generally support this indicator as agencies must regulate RTE species.
C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	Aerial photos have been taken over the past 2 years and are reviewed to insure ongoing maintenance of specific HCVs (Type I and II OG, oak woodlands). MRC also continued on the ground reconnaissance with several visits to Russell Brook Type I stand, and radar monitoring in LACMA to ensure murrelets are still utilizing the available habitat. There are ongoing efforts to restore and monitor oak woodlands in Ukiah block with native American tribes.
9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	During the 2010 recertification, The audit team could only confirm one instance where an HCV attribute was considered at increased risk on MRC property. In this instance an adjacent landowner trespassed onto MRC land and was cutting Pygmy forest, which MRC has identified as a HCVF and a unique community type. Once the risk was determined and the threat monitored, MRC took appropriate actions in response to the risk, well in conformance with this indicator. MRC has since pursued legal action on this adjacent landowner's use of a road that crosses MRC land. The court ruled in favor of MRC and established that the adjacent landowner does not have a deeded right of way.

APPENDICES

APPENDIX C: REGIONAL LIMITS AND OTHER GUIDELINES ON OPENING SIZES

This Appendix contains regional Indicators and guidance pertinent to maximum opening sizes and other guidelines for determining size openings and retention. These Indicators are requirements based on FSC-US regional delineations

Indicator 6.3.g.1

PACIFIC COAST REGION

Indicator 6.3.g.1.a: Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained. The levels of green-tree retention depend on such factors as: opening size, legacy trees, adjacent riparian zones, slope stability, upslope management, presence of critical refugia, and extent and intensity of harvesting across the FMU. Retention is distributed as clumps and dispersed individuals, appropriate to site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees. Regeneration harvest blocks in even-aged stands average 40 acres or less. No individual block is larger than 60 acres.

C

Variable retention (VR) units observed on the Noyo tract had both individual and group retention of conifers and hardwoods. The group retention units are of particular importance to understory species that may be sensitive to overstory removal or ground disturbance. As mentioned in 6.3.g.1, MRC meets the 10-30% pre-harvest basal area requirement through retention of conifers and hardwoods.

While the variable retention harvests are typically 20-30 acres the California Forest Practices Act (FPA) does allow units up to 200 acres. However, it is important to note that the retention required by the state significantly increases as the unit acres increase such that once the unit reaches 200 acres there is a

		<p>40% retention requirement which then moves the prescription away from an even aged classification into an uneven aged (transition) classification.</p> <p>All variable retention prescriptions are prescribed as rehabilitation in order to reduce the stocking of the hardwoods and increase the stocking of the conifers in order to move the species composition toward the composition that existed prior to the past high grade logging.</p>
<p>Indicator 6.3.g.1.b Even-aged silviculture may be employed where: 1) native species require openings for regeneration or vigorous young-stand development, or 2) it restores the native species composition, or 3) it is needed to restore structural diversity in a landscape lacking openings while maintaining connectivity of older intact forests.</p> <p>Guidance: <i>In some dry regions, retaining approximately 10 tons of debris per acre may be sufficient. In wetter regions, retaining 20 tons of debris per acre may be sufficient. Debris is well distributed spatially and by size and decay class, with a goal of at least 4 large pieces (approximately 20" diameter x 15' length) per acre. Three to 10 snags per acre (averaged over 10 acres) are maintained or recruited. Snags are well represented by size, species, and decay class.</i></p>	C	<p>VRs are employed where hardwood competitors hinder the regeneration or release of native conifers. Once conifers have been established, stands will transition to uneven-aged management. VRs are consistent with restoring historical conifer stocking and creating connectivity of wildlife habitats. For example, NSOs are typically relegated to areas that have not been harvested or that have grown for several decades. Restoration of conifers of multiple age classes may assist recovery and dispersal efforts.</p>
<p>Indicator 6.3.g.1.c Where necessary to protect against wind throw and to maintain microclimate, green trees and other vegetation are retained around snags, down woody debris, and other retention components.</p>	C	<p>On the Noyo tract's VR site, green trees and other vegetation was retained around snags, CWD, and other retention components. For example, snags and CWD was observed in group retention areas.</p>
<p>Indicator 6.3.g.1.d Native hardwoods and understory vegetation are retained as needed to maintain and/or restore the natural mix of species and forest structure.</p>	C	<p>As mentioned previously, the retention of native hardwoods in groups contributes to retention of understory protection as these areas are not entered during a harvest.</p>
<p>Indicator 6.3.g.1.e If regeneration harvest ages do not approach culmination of mean annual increment (CMAI), retention approaches the upper end of the range required in Indicator 6.3.h.1.a (above).</p>	C	<p>Since all future harvests that are modeled after the establishment of the desired conifer stocking are uneven aged, indicator 6.3.g.1.e that requires reaching CMAI prior to the regeneration harvest is not applicable.</p>
<p>Indicator 6.3.g.1.f No logical logging unit adjacent to a logged even-aged regeneration unit may be harvested using an even-aged regeneration method unless/until the prior even-aged regeneration unit is adequately stocked by a stand of trees in which the dominant and co-dominant trees average at least five feet tall and three years of age from the time of establishment on the site, either by planting or by natural regeneration. If the requirement to achieve adequate stocking is to be met with trees that were present at the time of harvest, there shall be a period not less than five years following the completion of operations before an adjacent even-aged regeneration harvest may occur.</p>	C	<p>The adjacency requirements in 6.3.g.1.f are nearly identical to the requirements of the California FPA and thus MRC was found to be in compliance.</p>

APPENDIX E: STREAMSIDE MANAGEMENT ZONE (SMZ) REGIONAL REQUIREMENTS

Indicator 6.5.e

This Appendix addresses regionally explicit requirements for Indicator 6.5.e and includes SMZ widths and activity limits within those SMZs for the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions. The forest owner or manager will be evaluated based on the sub-indicators within their specific region, below.

PACIFIC COAST REGION

PC Applicability note: The following water quality requirements of this Standard are superceded when and where state or federal laws, regulations, or other contractual requirements are more stringent.

PC Guidance: This section uses the following definitions:

Category A stream: A stream that supports or can support populations of native fish and/or provides a domestic water supply.

Category B stream: Perennial streams that do not support native fish and are not used as a domestic water supply.

Category C stream: An intermittent stream that never the less has sufficient water to host populations of non-fish aquatic species

Category D stream: A stream that flows only after rainstorms or melting snow and does not support populations of aquatic species

<p>6.5.e.1.a (PC only) For Category A streams, and for lakes and wetlands larger than one acre, an inner buffer zone is maintained. The inner buffer is at least 50 feet wide (slope distance) from the active high water mark (on both sides) of the stream channel and increases depending on forest type, slope stability, steepness, and terrain. Management activities in the inner buffer:</p> <ul style="list-style-type: none"> maintains or restore the native vegetation are limited to single-tree selection silviculture retain and allows for recruitment of large live and dead trees for shade and stream structure retain canopy cover and shading sufficient to moderate fluctuations in water temperature, to provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or restore riparian functions exclude use of heavy equipment, except to cross streams at designated places, or where the use of such equipment is the lowest impact alternative avoid disturbance of mineral soil; where disturbance is unavoidable, mulch and seed are applied before the rainy season avoid the spread of pathogens and noxious weeds avoid road construction and reconstruction. 	<p>C</p>	<p>See response to CAR 2010.7. The FME produced updated watercourse protection cards. Information on these cards for Class I Watercourses (FSC Class A) Revised 03/30/11:</p> <p>Class I Watercourses (FSC Class A) Revised 03/30/11</p> <ul style="list-style-type: none"> • No harvest (NH) to 100' • 100' – 190', 50% overstory canopy retention of all tree species • 100' – 150' selection silviculture only (FSC) • 100'- 190' a RMZ • Retain all conifer trees leaning over watercourses (0 – 190')
<p>6.5.e.1.b (PC only) For Category A streams, and for lakes and wetlands larger than one acre, an outer buffer zone is maintained. This buffer extends from the outer edge of the inner buffer zone to a distance of at least 150 feet from the edge of the active high water mark (slope distance, on both sides) of the stream channel. In this outer buffer, harvest occurs only where:</p> <ul style="list-style-type: none"> single-tree or group selection silviculture is used post harvest canopy cover maintains shading sufficient to moderate fluctuations in water temperature, provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or restore riparian functions new road construction is avoided and reconstruction 	<p>C</p>	<p>Information for Class I Watercourses (FSC Class A) Revised 03/30/11 includes:</p> <ul style="list-style-type: none"> • No harvest (NH) to 100' • 100' – 190', 50% overstory canopy retention of all tree species • 100' – 150' selection silviculture only (FSC) • 100'- 190' a RMZ • Retain all conifer trees leaning over watercourses (0 – 190')

<p>enhances riparian functions and reduces sedimentation; disturbance of mineral soil is avoided; where disturbance is unavoidable, mulch and seed are applied before the rainy season</p>		
<p>6.5.e.1.c (PC only) For Category B streams, a 25-foot (slope distance) inner buffer is created and managed according to provisions for inner buffers for Category A. A 75-foot (slope distance) outer buffer (for a total buffer of 100 feet) is created and managed according to provisions for outer buffer for Category A.</p>	C	<p>For Large Class II Watercourses (FSC Class B):</p> <ul style="list-style-type: none"> • NH to 75' • RMZ 75' – 190', 50% overstory canopy retention of all tree species if UNEVEN-aged. • RMZ 75' – 190', 65% overstory canopy retention of all tree species if EVEN-aged. • 75'-100', selection silviculture only (FSC) • Retain all conifer trees leaning over watercourse (WLPZ only)
<p>6.5.e.1.d (PC only) For Category C streams, and for lakes and wetlands smaller than one acre, a buffer zone 75 feet wide (on both sides of the stream) is established that constrains management activities to those that are allowed in outer buffer zones of Category A streams.</p>	C	<p>For Small Class II Watercourses (<100 acres), FSC Class C</p> <ul style="list-style-type: none"> • NH to 10' from channel bank edge • Active sliding, NH extends 10' above active scarp • Retain all conifer trees leaning over watercourse (WLPZ only) • On slopes less <30% adjacent to EVEN-aged silv, provide 75 foot WLPZ (FSC) • Retain all non-sprouting tree species directly adjacent to the stream channel where singular root masses provide for stability of banks and channel bottoms. • These trees shall be retained when their crowns extend into a plane directly above the edge of the stream channel. MRC shall not take more than 50% BA of redwood clumps directly adjacent to the stream channel • Outside 10' NH, retain at least 50% canopy cover of all tree species when UNEVEN-aged. • Outside 10' NH, retain at least 75% canopy cover of all tree species when EVEN-aged. <p>For Small Class II Waters other than watercourses (springs & seeps) and wet areas w/in a WLPZ:</p> <ul style="list-style-type: none"> • Single tree selection only in Class II WLPZ • Retain at least 50% overstory canopy cover of all tree species if UNEVEN-aged, 65% if EVEN-aged • Retain all conifer trees leaning over watercourse (WLPZ only) • Retain all non-sprouting tree species directly adjacentthe edge of the stream channel • Retain channel zone trees

<p>6.5.e.1.e (PC only) For Category D streams, management:</p> <ul style="list-style-type: none"> maintains root strength and stream bank and channel stability recruits coarse wood to the stream system minimizes management-related sediment transport to the stream system. <p>Streams, vernal pools, lakes, wetlands, seeps, springs, and associated riparian areas are managed to maintain and/or restore hydrologic processes, water quality, and habitat characteristics (see NMFS (1996); state water quality standards; Karr (1981) which may include: the capacity for water to infiltrate the soil; habitat for riparian species; moderating water temperature; controlling sedimentation; clean gravel for spawning; physical structures to protect the integrity of the stream channel; including pools used by anadromous fish.</p> <p>Forest owners or managers retain and recruit sufficient large, green trees; snags; understory vegetation; down logs; and other woody debris in riparian zones to provide shade, erosion control, and in-channel structures.</p>	C	<p>For Class III Watercourses which exhibit active downcutting and eroding banks (FSC Class D):</p> <ul style="list-style-type: none"> • The area from the bankfull channel edge out to 50' is an RMZ • NH to 10' • Active sliding, NH extends 10' above active scarp • Retain all conifer trees leaning over watercourse (RMZ only) • Retain all non-sprouting tree species directly adjacent to the edge of the stream channel • Balance of RMZ, retain at least 50% canopy cover of all tree species using single tree selection <p>For All other Class III Watercourses (FSC Class D):</p> <ul style="list-style-type: none"> • The area from the bankfull channel edge out to 50' is an RMZ, but managed as an ELZ • Retain all conifer trees leaning over watercourse (RMZ only) • Retain all non-sprouting tree species directly adjacent to the edge of the stream channel • Retain at least 50% overstory canopy cover of all tree species • Retain channel zone trees
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Appendix 8 – Chain of Custody Indicators for FMEs (CONFIDENTIAL)

SCS normally reviews its own COC indicators for FMEs. However, SCS does not require annual review of COC as does SW. Furthermore, it would be more confusing to the client to apply two COC standards. Therefore, SCS has defaulted to the SW COC indicators that are included in the SW report. FME should note that if it wishes to use FSC and/or SCS trademarks, it must seek approval through SCS.