

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

*Humboldt Redwood Company, LLC*  
*Mendocino Redwood Company, LLC*

Northern California, USA

**SCS-FM/COC-00120N**

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CERTIFIED	EXPIRATION
1 December 2019	30 November 2024

DATE OF FIELD EVALUATION
22 - 25 August 2022
DATE OF REPORT FINALIZATION
12 April 2023

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## Foreword

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

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

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

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual evaluation);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the evaluation.

### Organization of the Report

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

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## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Evaluation Team

<b>Auditor name:</b>	Brendan Grady	<b>Auditor role:</b>	Audit Team Leader
<b>Qualifications:</b>	Mr. Grady is the Director, Forest Management Certification for SCS. In that role, he provides daily management and quality control for the program. He participated as a team member and lead auditor in forest certification audits throughout the United States, Europe, and South East Asia. Brendan has a B.S. in Forestry from the University of California, Berkeley, and a Juris Doctorate from the University of Washington School of Law. Brendan is a member of the State Bar of California, and was an attorney in private practice focusing on environmental law before returning to SCS.		
<b>Auditor name:</b>	Kevin Boston, PhD, JD, PE, RPF	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b>	Dr. Boston has a strong educational background and has earned a BS in forestry from Humboldt State University, Master of Forestry, and Ph.D. in forest engineering from Oregon State University. His JD is from Lewis and Clark College and emphasized environmental and corporate law. He has significant professional experience as a practicing forester. His professional credentialing includes both a California Registered Professional Forester and Professional Engineer in Oregon. He has authored over 100 papers and seven books in forest management and engineering. He has held a variety of commercial appointments in forestry throughout the United States, New Zealand and Europe. He is currently a verification forester working the SCS Global Services and working on a variety of carbon sequestration and forest certification projects.		

#### 1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation	4
B. Number of auditors participating in on-site evaluation	2
C. Number of days spent by any technical experts (in addition to amount in line A)	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up	2
<b>E. Total number of person days used in evaluation</b>	<b>10</b>

#### 1.3 Applicable Standards

All applicable FSC standards are available on the websites of FSC International ([www.fsc.org](http://www.fsc.org)) or SCS Global Services ([www.SCSGlobalServices.com](http://www.SCSGlobalServices.com)). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements. "Applicable standards" are all FSC standards with which the certified entity must comply, not just the standards selected for evaluation this year.

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply based on type of certificate.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US Forest Management Standard (v1.0), July 8, 2010
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V8-0
	<input type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

### 1.4 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft.)	Meter (m)	0.3048
Yard (yd.)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by
Square foot (sq. ft.)	Square meter (m <sup>2</sup> )	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	To	multiply by
Cubic foot (cu ft.)	Cubic meter (m <sup>3</sup> )	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

## 2. Certification Evaluation Process

### 2.1 Evaluation Itinerary, Activities, and Site Notes

<b>Date:</b> August 22, 2022	
FMU / location / sites visited	Activities / notes
HRC/MRC/HRC offices in Scotia, CA/Opening Meeting	Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection.
HRC Offices	Management plan and document review, staff interviews
HRC/Scotia Select THP	Mix of group selection and single tree selection silviculture. Owl nest is present in the unit, surveys done prior to beginning

	operations indicate it was not occupied. Reviewed riparian buffer zones laid out in the harvest area.
HRC/Stitz in Time THP	Review of harvest area. 30-40 yr old RW & DF. Mix of selection and group selection. Discussed methods for monitoring residual logging damage.
HRC/Dyerville Fire Exemption harvest	High site productivity ground on flood plain near the Eel River. Cut to length system was used for a thinning harvest of 20 year old planted stands. Harvest area showed remarkably low residual damage.
<b>Date: August 23</b>	
<b>FMU / location / sites visited</b>	<b>Activities / notes</b>
HRC/ Johnny Castle THP	Completed Harvest using variable retention. Reviewed rocked crossings. Yarder side was used for VR harvesting. Reviewed group selection units as part of same THP. Target was 140 Basal area retained, harvested using feller buncher side. Discussed HCP requirements for maintaining habitat features on site, such as large hardwoods and woody debris.
HRC/Yager release units	Herbicide application site, using hack and squirt method on tanoak in order to release conifers. Reviewed site prescription. Discussed post application monitoring efforts.
HRC/Lawrence Creek Off-channel habitat restoration project	Review of restoration project, creation of a large pond adjacent and connected to the main channel. The feature provides habitat for juvenile fish away from the strong currents of the main channel. Discussed water quality monitoring, fish tagging.
HRC/Marbled Murrelet Monitoring Site	Monitoring site located in Marbled Murrelet Conservation Area. MMCA has identified Old Growth and scattered OG single trees with strong second growth. Monitoring project consists of audio/visual monitoring for detecting occupied sites. Radar testing for MM flights during the hours when the birds are moving to and from the ocean for feeding. Monitoring trend line indicates that the MM occurrence is similar to the control groups in the nearby state park.
HRC/Road 6, culvert installation	New culvert – 48 inch pipe. Discussed installation process. Road roller used for compacting road surface. crossing was identified as an erosion control point in the THP, inspected 3 times as part of the THP. Crossings all undergo an annual review as well in order to confirm their ongoing functioning.
HRC/6A THP	Group and single tree selection, similar to previous sites. Already completed sale, using feller buncher harvest. No concerns raised regarding this site.
HRC/POG THP	Active timber harvesting site, using cat and cable logging. Reviewed safety procedures, PPE, first aid kits, spill kits all present.
<b>Date: August 24</b>	
<b>FMU / location / sites visited</b>	<b>Activities / notes</b>

MRC/Ukiah Offices	Opening Meeting for MRC portion of audit. Discussion of MRC focused activities, review of management plan, staff interviews and documentation review.
MRC/ Russell Brook THP	Active harvesting operation, being conducted by Mendocino Forest Products logging side. Review of safety procedures. Variable retention harvest unit. Reforestation crew had already been on-site, control of huckleberry and tanoak. Discussed aggregate retention in VR harvest areas, maintenance of legacy trees.
MRC/Frykman THP	THP still in planning phase. Group selection and single tree selection to be used. Reviewed nearby in-stream large woody debris placement, done in cooperation with California Conservation Corps. Stream had been identified as in need of additional wood by CDFW. New arch site was discovered during the THP pre-harvest review, planned protection measure is to avoid the site.
<b>Date: August 25</b>	
<b>FMU / location / sites visited</b>	<b>Activities / notes</b>
MRC/ Masonite Road upgrades	<p>Following up from the previous audit, reviewed a series of road repairs and upgrades being done on a main haul road throughout the unit. The road has its own maintenance plan, since it connects to many THPs throughout the unit with numerous crossings. The plan was created in early '00s ranks the crossings in terms of need of treatment &amp; repair, with a 3 decade plan to address them all.</p> <p>Site #1 – 13.56 mile marker, 24” culvert being replaced with 48” culvert. New culvert is sized for 100yr flood event. Active equipment on site, reviewed spill kit, fire box, first aid.</p> <p>Site #2, 14.8 mile marker crossing, installation of 48” culvert, project had been completed since the previous audit.</p>
MRC/Redwood Creek THP	Normal silvicultural prescriptions for the site. Live Oak plant community was identified (2 acres in size), a rare community for this area. The patch had a protection zone placed around it and will not be entered. Active harvesting operation using a yarder. Hardwood suppressed stand, using variable retention to restore conifers on site. Some hardwood logs can be sold for firewood, but the market is small.
MRC/Ukiah Offices	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm evaluation findings
MRC/Ukiah Offices	Closing Meeting: Review preliminary findings (potential non-conformities and observations) and discuss next steps.

## 2.2 Evaluation of Management Systems

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

### 3. Changes in Management Practices

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

### 4. Results of Evaluation

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#### 4.1 Definitions of Major CARs, Minor CARs and Observations

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

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

*Observations:* These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.



## 4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation 2019	1 <sup>st</sup> Annual Evaluation 2020	2 <sup>nd</sup> Annual Evaluation 2021	3 <sup>rd</sup> Annual Evaluation 2022	4 <sup>th</sup> Annual Evaluation 2023
No findings	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
P1	Minor: 1.5.b	Major: 1.1.a	Minor: 1.1.a		
P2					
P3			Obs: 3.3.a		
P4	Obs: 4.5.b	Obs: 4.1.d, 4.2.b	Minor: 4.2.b	Obs: 4.2.a	
P5	Obs: 5.3.b				
P6	Minor: 6.3.a.1, 6.4.b, 6.4.c, 6.5.d; Obs: 6.6.a, 6.6.b; Major: 6.6.e	Minor: 6.5.b	Obs: 6.7.a	Minor: 6.4.a	
P7		Obs: 7.1.q		Obs: 7.3.a	
P8					
P9	Minor: 9.1.b, 9.2.a; 9.3.a; Obs: 9.3.b	Obs: 9.1.a			
P10					
COC for FM					
Trademark					
Group					
Other					

## 4.3 Existing Corrective Action Requests and Observations

<b>Finding Number: 2021.1</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 1.1.a
<input checked="" type="checkbox"/> <b>Non-Conformity Evidence</b> <input type="checkbox"/> <b>Observation Justification and/or Explanation</b>	
<p>The FMU received several violations related to completion of THP's since the last surveillance audit. These violations were all related to the expiration of THP's without a completion notice filing, for work not completed prior to filing a completion notice, or for work not up to standards and not accepted</p>	

<p>during the completion inspection. The FMU has developed a tracking system for tracking the expiration dates of THP's, Extensions of THP's and the filing of completion notices for THP's. This system addresses part of the non-conformity but does not address the situation where a completion notice has been filed but the work has not been done, or the work done does not meet standards of completion.</p> <p>Note that a previous non-conformance was raised against this indicator (2020.6). However the issues leading to each non-conformance are unrelated, and hence a minor CAR is warranted.</p>	
<p><input checked="" type="checkbox"/> <b>Non-Conformity Corrective Action Request</b>    <input type="checkbox"/> <b>Observation; no Corrective Action is required</b></p>	
<p>Forest management operations must demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations).</p>	
<p><b>FME response</b> <i>(including any evidence submitted)</i></p>	<p>To ensure that that work prescribed in a THP has been completed to specifications prior to submitting a completion report with Cal Fire company foresters have been trained to follow the THP completion checklist provided by Ben Hawk (12/21/2020) which contains the following information:</p> <p style="text-align: center;"><b>THP Completion Checklist</b></p> <ul style="list-style-type: none"> <li>○ Make copy of THP section 1-3 and 5 and put into binder or folder.</li> <li>○ Review proposed road work and make copies of maps and map point table for field. Check Geo report and item 38 for consistency.</li> <li>○ Determine if a report of stocking is needed and be prepared to evaluate stocking. Waiver or survey</li> <li>○ Review any amendments that changed road work</li> <li>○ Identify which sites are ECP points to track required inspections</li> <li>○ Determine in the field if sites were completed as prescribed in plan</li> <li>○ If work was not done or maintenance is required to be in compliance, make notes of what is needed</li> <li>○ Take photos</li> <li>○ Record date of inspection and by who</li> <li>○ Mark sites in the field</li> <li>○ Identify any additional maintenance that is needed to complete the plan</li> <li>○ Make determination for stocking report</li> <li>○ Update SOI</li> <li>○ Update corresponding map for SOI</li> </ul> <p>By following the checklist provided the foresters can provide documentation what work has been completed and what work if any remains prior to submitting a completion report. In addition, foresters are audited by the Forest Manager to ensure that their field review is accurate and thorough.</p> <p>In addition, both Companies have implemented a THP expiration tracking report. The intent of this report is to alert the Directors of Forest Operations for MRC, HRC and the Executive VP of Forestry if any plans are approaching expiration and need extension or completion reports – far enough in advance to take corrective action. This report has greatly assisted MRC and HRC staff in ensuring that all staff are aware of THPs that may have been missed by the process described above.</p>
<p><b>SCS review</b></p>	<p>The system for managing THP deadlines was reviewed, and is sufficient to address</p>

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

<b>Finding Number: 2021.2</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input checked="" type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 3.3.a
<input type="checkbox"/> <b>Non-Conformity Evidence</b> <input checked="" type="checkbox"/> <b>Observation Justification and/or Explanation</b>	
<p>HRC does invite consultation from tribal representatives over identification of archeological sites, and the audit team visited a THP where a joint inspection had occurred. However, stakeholder interviews expressed a frustration over the methods of these consultations, in that they too often followed the minimum methods of sending letters over the identification of archeological sites. Also, the tribes’ interest in forest management extends to other issues beyond just direct monitoring of arch sites.</p> <p>The FME has attempted more direct dialogue with tribal representative through personal communications from senior management. However, a misunderstanding about HRC declining to participate in a research project about condor reintroduction has set back this dialogue. An opportunity exists to continue building a relationship with the tribes based on more meaningful methods of consultation. This is only raised as an observation, since the FME is currently meeting the minimum requirements in the standard.</p>	
<input type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input checked="" type="checkbox"/> <b>Observation; no Corrective Action is required</b>	
<p>Stakeholder consultation with tribal representatives could be improved by moving beyond the primarily regulatory driven consultation methods of formal letters and towards a more open dialogue.</p>	
<b>FME response</b> (including any evidence submitted)	<p>Companies believe SCS auditors misunderstood our outreach to Native American indigenous peoples. Throughout the Companies organization, staff at all levels (especially forestry and forest science staff) have opportunities to interact with various members of local and regional tribes. For instance, in June of 2022, Sal Chinnici met with the Bear River Band wildlife office, along with others on Zoom, to discuss rehab and release (hacking) of golden eagle juveniles near Petrolia (Lighthouse Ranch) that will occur in July. Mike Miles provided a property boundary shapefile to Ana Cantor from the Bear River Band of the Rohnerville Rancheria at her request to assist with tribal assessments of submitted timber harvest plans. John Andersen has regular contact with a member of the Yurok tribe related to carbon credit offsets. Additional outreach within the recent years</p>

	<p>include: (1) extending an agreement in 2020 to continue to co-manage a pre-historic village site and cultural landscape with the Pinoleville Pomo Nation through December 31, 2022 (including Director of Forest Management Ben Hawk meeting with Bernadette Mora of Pinoleville Pomo Nation) to personally introduce himself; and (2) permitting entry of the Manchester/Point Arena Band of Pomo Indians, and a large group to gather acorns.</p> <p>However, a large majority of the interaction occurs during timber harvest plan preparation and implementation. We believe this is due to the potential for impact to important cultural sites – thus effort is focused on ensuring these sites are identified and protected appropriately. Several tribal interactions regarding review or protection of sites have been included in the findings responses folder.</p>
<b>SCS review</b>	Based on the additional interactions described in this response, this observation is closed.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2021.3</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 4.2.b
<input checked="" type="checkbox"/> <b>Non-Conformity Evidence</b> <input type="checkbox"/> <b>Observation Justification and/or Explanation</b>	
<p>This CAR is an upgrade from OBS 2020.3 from the 2020 surveillance audit. During the 2020 surveillance audit a video and still photos showed that a logging faller was not wearing proper PPE. The HRC/MRC response to this OBS indicated that contract managers were expected to ensure the standards of the contract were met during inspections of operations and to notify contractor leads and forest manager or director if there are issues with operations. The FMU’s indicated in this way that the safety requirements were met. During the 2021 surveillance audit two THP’s were visited where proper PPE was not being utilized by members of the contractor’s logging crew. On the Newman THP a faller and landing crew members operating chain saws were not wearing eye protection. On the Hidden Lake THP three equipment operators left the cabs of their equipment and did not wear hardhats.</p>	
<input checked="" type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input type="checkbox"/> <b>Observation; no Corrective Action is required</b> The FMU must develop more effective means of contract compliance by FMU staff to assure that contract loggers and other contractors are following all stipulated health and safety practices as contained in the Logging Contracts and other contracts and the HRC/MRC Environmental Health and Safety Contractor Manual.	

<b>FME response</b> <i>(including any evidence submitted)</i>	HRC Director of Forestry Operations sent the included e-mail to staff (Timber_operator_safety_and_fire_prevention.pdf) regarding contractor safety and fire prevention. MRC Director of Forestry Operations provided access to safety and fire prevention inspections (Safety_and_fire_prevention_inspections.pdf). All forestry staff interacting with contractors have been trained on completing inspections and process for notifying contractor of observed non-conformities. If non-conformities with the checklist inspection are noted, the forester or forest manager will contact the Licensed Timber Operator to correct the issue.
<b>SCS review</b>	Samples of completed inspections were reviewed. Site visits during the 2022 audit showed strong compliance with utilization of PPE. Based on this, the finding is closed.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2021.4</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input checked="" type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 6.7.a
<input type="checkbox"/> <b>Non-Conformity Evidence</b> <input checked="" type="checkbox"/> <b>Observation Justification and/or Explanation</b>	
<p>During the 2021 surveillance audit each active operation was asked to show the presence of a spill kit where it was readily available to respond to a hazardous spill. On all sites but the Wadsworth THP the spill kits were readily available and were observed by the auditors. In discussions with contractors and their crews they indicated they were trained in the use of the available spill kits. On the operations on the Wadsworth THP, the contractor indicated there was a spill kit available; however, the kit was not located where it was thought to be and in fact was on a vehicle which was not in close proximity to the logging equipment in operation and therefore was not readily available to control a hazardous spill. Since this was an isolated case and there may have been a spill kit somewhere on their operation, this finding is issued as an OBS.</p>	
<input type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input checked="" type="checkbox"/> <b>Observation; no Corrective Action is required</b> The FMU should develop more effective means of contract compliance by FMU staff to assure that contract loggers and other contractors are following all stipulated requirements with regard to hazardous spills, as contained in the Logging Contracts.	
<b>FME response</b> <i>(including any evidence submitted)</i>	HRC Director of Forestry Operations sent the included e-mail to staff (Timber_operator_safety_and_fire_prevention.pdf) regarding contractor safety and fire prevention. MRC Director of Forestry Operations provided access to safety and fire prevention inspections (Safety_and_fire_prevention_inspections.pdf). All forestry staff interacting with contractors have been trained on completing

	inspections and process for notifying contractor of observed non-conformities. If non-conformities with the checklist inspection are noted, the forester or forest manager will contact the Licensed Timber Operator to correct the issue.
<b>SCS review</b>	Samples of completed inspections were reviewed. Site visits during the 2022 audit showed strong compliance with presence of spill kits on site during active operations. Based on this, the finding is closed.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

#### 4.4 New Corrective Action Requests and Observations

<b>Finding Number: 2022.1</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input checked="" type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 7.3.a
<input type="checkbox"/> <b>Non-Conformity Evidence</b> <input checked="" type="checkbox"/> <b>Observation Justification and/or Explanation</b>  HRC/MRC has the opportunity to bring in outside expertise in its road construction projects. In particular two culvert replacements on the Masonite road visited during this audit involved an extensive amount of earth movement. Outside of a THP, such projects would normally involve a licensed engineer. There was no clear mechanism for when additional expertise needs to be brought in for such projects.	
<input type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input checked="" type="checkbox"/> <b>Observation; no Corrective Action is required</b>  The organization should take appropriate steps to resolve the identified observation.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2022.2</b>
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<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input checked="" type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 7.3.a
<input type="checkbox"/> <b>Non-Conformity Evidence</b> <input checked="" type="checkbox"/> <b>Observation Justification and/or Explanation</b>  Increasing use of forest workers for whom Spanish is the primary language may present challenges for communication. In one case, interviewing members of a logging crew it was observed that communication between English and Spanish speaking members of the crew was limited since there was no one on site able to translate. This has the potential to lead to implementation and safety challenges during operations.	
<input type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input checked="" type="checkbox"/> <b>Observation; no Corrective Action is required</b>  The organization should take appropriate steps to resolve the identified observation.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2022.3</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input checked="" type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 4.2.a
<input type="checkbox"/> <b>Non-Conformity Evidence</b> <input checked="" type="checkbox"/> <b>Observation Justification and/or Explanation</b>  At the Stitz in time THP, two anchoring stumps for the lines supporting the yarder had not been cut at an angle in order to secure the line. Best practice is to angle the cuts in order to decrease the chance of the line slipping. This is graded an observation, since in the view of the auditors the anchor stumps met minimum California requirements, but could be improved.	

<input checked="" type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input checked="" type="checkbox"/> <b>Observation; no Corrective Action is required</b> The organization should take appropriate steps to resolve the identified observation.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2022.4</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): HRC/MRC	
<b>Standard and Indicator</b>	FSC Forest Management Standard (v1.0) – US – 6.4.a
<input checked="" type="checkbox"/> <b>Non-Conformity Evidence</b> <input type="checkbox"/> <b>Observation Justification and/or Explanation</b> The Representative Sample Area analysis conducted by HRC/MRC does not fully document the ecosystems that would naturally exist on the FMU and assess the adequacy of their protection on the landscape. The organization has developed an identified list of 33 ecosystems which naturally occur on the management unit, but these have not all been mapped on the FMU or assessed as to the adequacy of their representation and protection on the landscape. HRC has designated a list of specific RSAs, but there is not an adequate explanation of why these ecosystems were chosen.	
<input checked="" type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input type="checkbox"/> <b>Observation; no Corrective Action is required</b> The organization must document the ecosystems that would naturally exist on the FMU, and assess the adequacy of their representation and protection in the landscape.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

## 5. Stakeholder Comments

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

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

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

### 5.1 Stakeholder Groups Consulted

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

### 5.2 Summary of Stakeholder Comments and Evaluation Team Responses

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

<input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties (who are not members of the enterprise under evaluation) as a result of stakeholder outreach activities during this annual evaluation.</i>
<p><b>Summary of Outreach Activities Conducted (Check all that apply):</b></p> <input type="checkbox"/> Face to face meetings <input checked="" type="checkbox"/> Phone calls <input checked="" type="checkbox"/> Email, or letter <input type="checkbox"/> Notice published in the national and/or local press <input type="checkbox"/> Notice published on relevant websites <input type="checkbox"/> Local radio announcements <input type="checkbox"/> Local customary notice boards

<input type="checkbox"/> Social media broadcast	
Stakeholder Comment (Negative, positive, and neutral)	SCS Response
A lawsuit was filed over Russell Brook THP, alleging violations of the Forest Practices Act, including harvesting of old growth and violations of Mendocino county measure V restricting herbicide use.	This particular lawsuit was dropped after the request for an emergency injunction was not approved by the court. The general topics raised in the suit are similar to past criticisms of HRC/MRC. The company has challenged the legality of measure V, and this issue remains unresolved (see discussion in the 2020 surveillance audit report). Harvesting of old growth trees is prohibited by company policy, and this policy is regularly reviewed during audits. Without more specific information, no non-conformances are warranted based on these allegations.
A stakeholder criticized the companies harvesting rates as exceeding what can be sustained.	Harvesting rates for the companies are controlled by regulations which require the landowner to demonstrate a sustained yield through its planning process. Review of the harvest data showed that harvested forest products are consistently less than what is being grown. Without more specific information, no non-conformances are warranted.

## 6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME's response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Comments:</b>	

## 7. Annual Data Update

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

### Name and Contact Information

<b>Organization name</b>	Mendocino and Humboldt Redwood Companies		
<b>Contact person</b>	Sarah Billig		
<b>Address</b>	PO Box 996	<b>Address</b>	PO Box 996
	Ukiah, CA 95418		Ukiah, CA 95418
		<b>Fax</b>	

		<b>e-mail</b>	
		<b>Website</b>	

**FSC Sales Information**

<input type="checkbox"/> FSC Sales contact information same as above.			
<b>FSC salesperson</b>	Adam Steinbuck, Vice President		
<b>Address</b>	PO Box 712	<b>Address</b>	PO Box 712
	Scotia, CA 95565		Scotia, CA 95565
		<b>Fax</b>	
		<b>e-mail</b>	
		<b>Website</b>	

**Scope of Certificate**

<b>Certificate Type</b>	<input type="checkbox"/> Single FMU	<input checked="" type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
<b>SLIMF (if applicable)</b>	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
<b># Group Members (if applicable)</b>	n/a	
<b>Number of FMUs in scope of certificate</b>	2	
<b>Geographic location of non-SLIMF FMU(s)</b>	Latitude & Longitude: MRC: 39 deg 10'41.02"N; 123deg 14'18.93"W; HRC: 40 deg 29'00.61"N; 124deg 06'11.55"W	
<b>Forest zone</b>	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
<b>Area in scope of certificate which is:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac		
privately managed	443,516	
state managed		
community managed		
<b>Total forest area in scope of certificate</b> <i>(Is also equal to [productive area] + [conservation area])</i>	443,516	
<b>Prior year total forest area in scope of certificate</b> <i>(from prior year report)</i>	438,461	
<b>Has Total forest area changed from prior year?</b>	<input checked="" type="checkbox"/> No Change from prior year <input checked="" type="checkbox"/> Yes, there was a change from prior year. Explain change: HRC purchased Walsh Timberlands in 2022 which added to the overall acreage.	
<b>Number of FMUs in scope that are:</b>		
less than 100 ha in area		100 - 1000 ha in area

1000 - 10 000 ha in area		more than 10 000 ha in area	2
<b>Total forest area in scope of certificate which is included in FMUs that:</b>		<b>Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac</b>	
are less than 100 ha in area	0		
are between 100 ha and 1000 ha in area	0		
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0		
<b>Division of FMUs into manageable units:</b>			
The two FMUs are divided into management units as follows.			
HRC:			
MAD	4909		
FRESHWATER	15536		
LAWRENCE	14603		
ELK	22069		
YAGER	19286		
STRONGS	5705		
VAN DUZEN	22784		
EEL	24133		
SHIVELY	14551		
BEAR	16694		
LARABEE	24044		
MATTOLE	18325		
MCCANN	8532		
MRC:			
Alder Creek	11286		
Annapolis	7051		
Big River South	17685		
Garcia River	15233		
Hollow Tree	21060		
Rockport Coastal	18161		
Navarro West South	14702		
Willow Creek	1822		
Big River North	8963		
Navarro East North	13462		
Ukiah	13039		
Noyo	21773		
Navarro West North	9862		
Greenwood Creek	9790		
Elk Creek	14143		
Navarro East South	17695		

Albion	16614
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**Non-SLIMF FMUs (Group or Multiple FMU Certificates)**

Name	Contact information	Latitude/ longitude of Non-SLIMF FMUs
NA		

**Social Information**

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
Male workers: 501	Female workers: 31	
Number of accidents in forest work since previous evaluation:		Serious: 0
		Fatal: 0

**Pesticide and Other Chemical Use (June 2021 – June 2022)**

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
Accord XRT	Glyphosate	141.96	126	Control competing vegetation
Cleantraxx	Oxyfluorfen	15.72	9	Control competing vegetation
Element 3A	Triclopyr amine	205.5	202	Control competing vegetation
Element 4	Triclopyr	322	189	Control competing vegetation
Esplanade F	Indaziflam	40.8	619	Control competing vegetation
Forestry Garlon XRT	Triclopyr ester	459.9	300.5	Control competing vegetation
Imazapyr 4SL	Imazapyr	926	1,183.50	Control competing vegetation

Milestone	Aminopyralid	5.7	86	Control competing vegetation, control exotic species
Oust XP	Sulfometuron Methyl	116.85	988.5	Control competing vegetation
1089	Imazapyr	1,089.90	1902.5	Control competing vegetation
Polaris SP	Imazapyr	202.5	397	Control competing vegetation
Ranger Pro	Glyphosate	88	106	Control competing vegetation
Rotary 2SL	Imazapyr	144	291	Control competing vegetation
Transline	Clopyralid	45.57	289.5	Control competing vegetation
Velossa	Hexazinone	175.2	166.5	Control competing vegetation
Vista XRT	Fluroxypyr	4.2	10	Control competing vegetation
Glystar	Glyphosate	15	18	Control exotic species
Polaris AC	Imazapyr	714.5	1657	Control competing vegetation
Glyphosate 5.4	Glyphosate	24.3	91	Control competing vegetation
Buccaneer	Glyphosate	0.8	1	Control competing vegetation
Garlon XRT	Triclopyr	463.1	211	Control competing vegetation

**Production Forests**

<b>Timber Forest Products</b>	<b>Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac</b>
Total area of production forest (i.e. forest from which timber may be harvested)	387,924
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	158,272
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	229,152
<b>Silvicultural system(s)</b>	<b>Area under type of management</b>
Even-aged management	0
Clearcut (clearcut size range: NA)	0
Shelterwood	0
Other:	0
Uneven-aged management	387,924
Individual tree selection	129,308
Group selection	129,308
Other: variable retention, rehabilitation, etc	129,308
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	NA
<b>Non-timber Forest Products (NTFPs)</b>	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
<b>Species in scope of joint FM/COC certificate: <i>Scientific/ Latin Name</i> (Common/ Trade Name)</b>	
<i>Sequoia sempervirens</i> (redwood); <i>Pseudotsuga menziesii</i> (Douglas-fir); <i>Abies grandis</i> (grand fir); <i>Eucalyptus spp.</i> (Eucalyptus); <i>Notholithocarpus spp.</i> (tanoak); <i>Tsuga heterophylla</i> (Raf.); and Sarg (western hemlock); <i>Abies magnifica</i> (red fir), <i>Pinus muricata</i> (Bishop pine), <i>Pinus radiata</i> (Monterey pine), <i>Pinus Lambertiana</i> (Sugar pine)	

**FSC Product Classification\***

<b>Timber products</b>		
<b>Product Level 1</b>	<b>Product Level 2</b>	<b>Species</b>
W1	W1.1	All of the above
W3	W3.1	All of the above
<b>Non-Timber Forest Products</b>		
<b>Product Level 1</b>	<b>Product Level 2</b>	<b>Product Level 3 and Species</b>

*\*Note: W1, W2, and W3 product groups usually do not require a separate evaluation to FSC-STD-40-004 (COC) if processing occurs in the field for FM/COC and CW/FM certificate types. N1-N10 (NTFPs) are eligible to be sold with FSC claims under FM/COC certification if reported here. Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) may be eligible for FM/COC and CW/FM certification. NTFPs used for food and medicinal purposes are not eligible for CW/FM certification. Check with SCS if you have any products intended to be sold with an FSC claim outside of any of these categories.*

### Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
<b>Total amount</b> of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	55,746

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



High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	Streamside zones, NSO protected areas, pygmy forest, oak woodland, marbled murrelet habitat, Point Arena mountain beaver habitat	39,475
HCV2	Forests or 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.	Long Ridge	203
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	Type 1 and 2 old growth, salt marsh	3,860
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Community water source	23
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	-	-
HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).	-	-
<b>Total area of forest classified as 'High Conservation Value Forest / Area'</b>			43,561

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

<input checked="" type="checkbox"/> N/A – All forestland owned or managed by the certificate holder is included in the scope.		
<input type="checkbox"/> Certificate holder owns and/or manages other FMUs not under evaluation.		
<input type="checkbox"/> Certificate holder wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
<b>Note:</b> Excision cannot be applied to CW/FM certificates.		
<b>Explanation for exclusion of FMUs and/or excision:</b>	NA	
<b>Control measures to prevent mixing of certified and non-certified product (C8.3):</b>	NA	
<b>Description of FMUs excluded from, or forested area excised from, the scope of certification:</b>		
<b>Name of FMU or Stand</b>	<b>Location (city, state, country)</b>	<b>Size (<input type="checkbox"/> ha or <input type="checkbox"/> ac)</b>


**SECTION B – APPENDICES** (CONFIDENTIAL)

**Appendix 1 – List of FMUs Selected for Evaluation**

- FME consists of a single FMU
- FME consists of multiple FMUs or is a Group

SCS staff establish the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled and the rationale behind their selection is listed below.

FMU Name	FMU Size Category: – SLIMF – non-SLIMF – Large > 10,000 ha	Forest Type: – Plantation – Natural Forest	Rationale for Selection: – Random Sample – Stakeholder issue – Ease of access – Other (please describe)
Humboldt Redwood Company	Large	Natural Forest	Level of activity
Mendocine Redwood Company	Large	Natural Forest	Level of activity

**Appendix 2 – Staff and Stakeholders Consulted**

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### **List of FME Staff Consulted**

**To protect privacy, only FME staff who have expressly provided written permission are listed. These records are retained by SCS and subject to FSC or ASI examination.**

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Name	Title	Contact Information	Consultation method
Dennis Thibeault	Executive Vice President, Forestry	DThibeault@mendoco.com	In person
Sarah Billig	Director, Stewardship	sbillig@mendococo.com	In person, telephone, virtual meeting, email
Amanda Pelletier	GIS Manager	apelletier@hrcell.com	In person
Sal Chinnici	Director, Forest Science	707-845-3012, schinnici@hrcell.com	In person, email
Ben Hawk	Director, Forest Operations, MRC	707-489-2871	In person, email
Mike Miles	Director, Forest Operations, HRC	mmiles@hrcell.com	In person, email
Deakon Duey	South Area Manager, HRC	707-272-0911	In person
Mark Distefano	North Area Manager, HRC	707-296-8453	In person

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<b>Donnie Escamilla</b>	<b>Forester II, Compliance, HRC</b>	<b>Descamilla@hrcllc.com</b>	<b>In-person</b>
<b>Joshua Petitmermet</b>	<b>Forest Inventory Analyst</b>	<b>707-513-5006</b>	<b>In-person</b>
<b>Haley Ross</b>	<b>Natural Resources Writer</b>	<b>707-489-6500</b>	<b>In-person</b>
<b>Brian Brozniski</b>	<b>Silviculture Manager</b>	<b>-</b>	<b>In-person</b>
<b>Chris Hayter</b>	<b>Coast Forest Manager</b>	<b>707-462-7001, chayter@mendoco.com</b>	<b>In-person</b>
<b>Maneesha Jayasuriya</b>	<b>Forest Carbon Analyst</b>	<b>MJayasuriya@mendoco.com</b>	<b>In-person</b>
<b>Clayton Wanzer</b>	<b>Forester</b>		<b>In-person</b>
<b>Matthew Costa</b>	<b>Forester</b>	<b>707-671-4956</b>	<b>In-person</b>
<b>John Kuhry</b>	<b>Asset Manager</b>	<b>707-467-3388</b>	<b>In-person</b>
<b>David Ulrich</b>	<b>MRC – Biologist</b>	<b>dulrich@mendoco.com</b>	<b>In-person</b>

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<u><a href="#">Paul Bialkowski</a></u>	<u><a href="#">Mgr Fiber Resources</a></u>	<u><a href="mailto:pbialkowski@mendoco.com">pbialkowski@mendoco.com</a></u>	<u><a href="#">In person</a></u>
<u><a href="#">Mike Wirta</a></u>	<u><a href="#">Mgr MFP Logging</a></u>	<u><a href="mailto:mwirta@mendoco.com">mwirta@mendoco.com</a></u>	<u><a href="#">In person</a></u>
<u><a href="#">Parsa Arjomandi</a></u>	<u><a href="#">Forester</a></u>	<u><a href="mailto:parjomandinezhad@mendoco.com">parjomandinezhad@mendoco.com</a></u>	<u><a href="#">In person</a></u>
<u><a href="#">Julian Womble</a></u>	<u><a href="#">RPF</a></u>	<u><a href="mailto:jwomble@mendoco.com">jwomble@mendoco.com</a></u>	<u><a href="#">In person</a></u>
<u><a href="#">Cody Easton</a></u>	<u><a href="#">Forester</a></u>	<u><a href="mailto:ceaston@mendoco.com">ceaston@mendoco.com</a></u>	<u><a href="#">In person</a></u>
<u><a href="#">James Regan</a></u>	<u><a href="#">Lead Botanist</a></u>	<u><a href="mailto:jregan@hrcllc.com">jregan@hrcllc.com</a></u>	<u><a href="#">In person</a></u>

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**List of other Stakeholders Consulted\***

**To protect privacy, only stakeholders who have expressly provided written permission are listed. These records are retained by SCS and subject to FSC or ASI examination.**

Name	Title	Contact Information	Consultation method	Requests Stakeholder Notification? (Y/N)
Kelly McCannless	McCannless Excavating		Interview	N
Jaime Gonzalez	Northwestern Timber Falling		Interview	N
Darrell Gilmore	Leonardo Logging		Interview	N
Jake Morris	Owner/Jake Morris Logging	<a href="mailto:jake@steve.morrislogging.com">jake@steve.morrislogging.com</a>	Interview	Y
Other stakeholders not providing report permission				

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*\* Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities, such communications are retained by SCS subject to FSC and ASI examination.*

### Appendix 3 – Additional Evaluation Techniques Employed



**None.**

**Additional techniques employed (describe):**

**Appendix 4 – Required Tracking**

**Pesticide Derogations**

**There are no active pesticide derogations for this FME.**

Name of pesticide / herbicide (active ingredient)		Date derogation approved
Condition	Conformance (C / NC)	Evidence of progress

**Progressive HCVF Assessments**

**FME does not use partial or progressive HCVF assessments.\***

*\*Note: In the case the FME is not operating in the entire management unit, it is permissible to only complete an HCVF assessment for the portion of the unit in which they are operating under special conditions. In such cases, the HCVF assessment must be extended if new areas are entered without an existing, appropriate HCVF assessment having been completed. An example includes a large forest concession where harvesting is initially limited to a smaller geographic scope.*

**Partial or progressive HCV must be noted in SCS tracking system for monitoring. Describe below the FME monitoring plan to ensure additional HCVF assessments are completed as necessary:**

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## Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

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<input checked="" type="checkbox"/>	<b>Not applicable; no significant issues identified that may impact the next audit.</b>
<b>Some issues were identified during this audit that the next audit team could consider in the next audit, such as:</b>	
<input type="checkbox"/>	<b>Scope of certificate: _____</b>
<input type="checkbox"/>	<b>Audit sampling: _____</b>
<input type="checkbox"/>	<b>Audit time: _____</b>
<input type="checkbox"/>	<b>Audit season: _____</b>
<input type="checkbox"/>	<b>Travel time between sites or FMUs: _____</b>
<input type="checkbox"/>	<b>Audit frequency: _____</b>
<input type="checkbox"/>	<b>Suggested audit team competency for next audit: _____</b>
<input type="checkbox"/>	<b>Suggested requirements to include during the next audit: _____</b>
<input type="checkbox"/>	<b>Suggested issues investigate during the next audit: _____</b>
<input type="checkbox"/>	<b>Suggested sites for inspection: _____</b>
<input type="checkbox"/>	<b>Stakeholders to be consulted: _____</b>
<input type="checkbox"/>	<b>Other(s) — please describe: _____</b>

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*~~\*Note: information audit team leaders wish to remain confidential may be communicated directly to SCS.~~*

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**Appendix 5—Forest Management Standard Conformance Table**

<p><del>Criteria required by FSC at every surveillance evaluation (check all situations that apply)</del></p>	<p><del><input type="checkbox"/> NA— all FMUs are exempt from these requirements.</del></p> <p><del><input type="checkbox"/> Plantations &gt; 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8</del></p> <p><del><input checked="" type="checkbox"/> Natural forests &gt; 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4</del></p> <p><del><input checked="" type="checkbox"/> FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4</del></p>
<p><del>Documents and records reviewed for FMUs/ sites sampled</del></p>	<p><del><input checked="" type="checkbox"/> All applicable documents and records as required in audit plan were reviewed; or</del></p> <p><del><input type="checkbox"/> The following documents and records as required in the audit plan were NOT reviewed (provide explanation):</del></p>

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**Requirements Reviewed in Annual Evaluation**

Evaluation Year	Requirements Reviewed (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.)
2019	All (Re)certification Evaluation
2020	P3, P6, and P9 and Criteria 1.5, 2.3, 4.2, 4.4, 4.5, 5.3, 7.3, and 8.2. This included indicators for which findings were issued during the 2019 audit. FSC Trademark Standard.
2021	P1, P2, annual required criteria to be evaluated, FSC Trademark Standard
2022	P7, P8, annual required criteria to be evaluated, FSC Trademark Standard
2023	-

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***C= Conformance with Criterion or Indicator***

***NC= Nonconformance with Criterion or Indicator***

***NA = Not Applicable***

***NE = Not Evaluated***

REQUIREMENT	C/N C	COMMENT/CAR
<p><b>Principle #1: Compliance with Laws and FSC Principles</b></p> <p>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.</p>		
<p><b>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b></p>	<p>C</p>	<p>-</p>
<p><b>1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the Forest Management Unit (FMU).</b></p>	<p>C</p>	<p>As confirmed through interviews with employees, FME employs full-time security personnel for both FMUs. Forestry personnel regularly travel all main access roads into and through the FMUs. This ongoing presence appears to be an effective measure to prevent illegal or unauthorized activities, as there are few reported cases of illegal or unauthorized activities on the two FMUs.</p>

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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>Incidents of trespass and illegal activity have occurred on FME property. These occurrences have included illegal dumping, vandalism of access gates, and vehicular trespass. FME has hired private security guards to monitor access to high risk areas where trespass and protestors have been an ongoing problem. This strategy is used particularly in management units close to populated areas, such as the Albion and Mattole.</b></p>
<p><b>Principle #2: Long term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b></p>		

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<p><del>2.3. 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.</del></p>	<p>€</p>	<p>-</p>
<p><del>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.</del></p>	<p>€</p>	<p><del>Interviews with employees confirm that disputes over tenure claims or use rights rarely arise on the FMUs. FME employees state that they would seek to resolve any such issues through open communication and negotiation.</del></p>

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<p><b>2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.</b></p>	<p><b>C</b></p>	<p><b>FME employees interviewed during the audit acknowledge their responsibility to fully document their efforts at resolution if significant disputes over tenure or use rights were to arise. The FME's monitoring of stakeholder input suggest that they would thoroughly document any significant disputes over tenure and use rights if they were to occur.</b></p>
<p><b>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b></p>		
<p><b>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</b></p>	<p><b>NA</b></p>	<p><b>This is not a tribal forest.</b></p>
<p><b>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b></p>	<p><b>C</b></p>	<p><b>-</b></p>

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<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>The FME adheres to California Forest Practice Rules, which requires notification to tribal entities as part of THP process. Although no American Indian groups have legal rights or other binding agreements to the FMUs, company employees aim to ensure that cultural resources are maintained. In the past, FME has received letters from tribal leaders commending this notification process. Numerous examples of ongoing communication with tribes were reviewed during the audit, see response to finding 2021.2.</del></p>
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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>Archeological surveys occur on each THP as part of harvest planning, and appropriate measures are taken to ensure that any discovered resources are protected. Managers show great sensitivity to this and have a good understanding of areas on the FMUs that have a high probability of having cultural resources. FME foresters also receive training on the identification of archeological sites.</b></p>
<p><b>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b></p>		
<p><b>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b></p>	<p><b>C</b></p>	<p><b>-</b></p>

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<p><del>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).</del></p>	<p><del>C</del></p>	<p><del>Interviews with Health and Safety Managers for the FME clearly support compliance in this area. The FME has various policies in place that encourage employees to report areas where safety can be improved. Hourly employees are brought together to discuss health and safety concerns. Employees are rewarded for safety observations and fixes that the company could implement to improve the work environment. Management strives to make safety a part of the culture at the company. There is also a contractor orientation program to ensure that all contractors understand safety requirements; the FME seeks a copy of the certificate of insurance review for each contractor. Field observations at active sites and conversations with FME employees, as well as review of sign-in sheets for safety trainings, provided additional evidence that the FME meets</del></p>
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~~or exceeds all applicable laws and/or regulations covering health and safety.~~

~~However, At the Stitz in time THP, two anchoring stumps for the lines supporting the yarder had not been cut at an angle in order to secure the line. Best practice is to angle the cuts in order to decrease the chance of the line slipping. This is graded an observation, since in the view of the auditors the anchor stumps met minimum California requirements, but could be improved. See OBS 2022.3.~~

<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>The FME employees were seen wearing appropriate PPE and demonstrated a safe work environment. Harvest contracts require that the LTO operates in conformance with applicable law, including health and safety regulations. Logging crews were observed wearing appropriate PPE on active sites. Documentation provided by safety managers highlights the company's diligent focus on maintaining a safe working environment. See evidence in response to 2021.3</del></p>
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<p><b>4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.</b></p>	<p><b>C</b></p>	<p><b>Interviews with the Health and Safety managers for the FME support the fact that well-qualified service providers are implementing the management plan. FME also conducts a mandatory contractor safety training session multiple times throughout the year for all contractors. Interviewed contractors were knowledgeable about appropriate safety equipment and practices.</b></p>
<p><b>4.4. 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.</b></p>	<p><b>C</b></p>	<p><b>-</b></p>

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**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:**

• **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;**

**C**

**The FME has, from its inception, endeavored to establish and maintain active dialogue with neighbors and interested stakeholders. Despite these efforts that continue to this day, the tenor of relations with many neighbors and the regional environmental community has eroded over the past few years in relation to key issues such as herbicide use, protection of HCVs, and concerns over sedimentation into watercourses. The audit team recognizes that commercial forest management anywhere in California, all the more so on the North Coast, is inherently contentious.**

**The FME has an ongoing system for tracking stakeholder interactions, which is used to track stakeholder feedback and reaction over time, as**

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**Commented [DT1]:** We spend much less time today addressing concerns brought to us by the community. A statement like this should be better supported or not included in this report.



<p><del>Other people who may be affected by management operations.</del></p> <p><del>A summary is available to the CB.</del></p>		<p><del>stakeholder feedback is an ongoing process.</del></p> <p><del>The FME's website includes a summary of the social components of its operations.</del></p>
<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>FME has a strong track record of inviting community input and engaging in dialogue with neighbors and other interested parties about management planning. As part of its socioeconomic monitoring plan, FME documents input from community members. Interviews with neighboring landowners confirmed that the company is interactive and communicative about actions that will occur that may impact them.</del></p>

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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>FME adheres to the California Forest Practice Rules requirement that owners of property neighboring a THP must be provided with written notice of pending activities. FME's transparency to the public and its practice of continually communicating with the local community also serves as mechanisms for apprising people affected by management operations.</b></p>
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<p><b>4.4.d For public forests, consultation shall include the following components:</b></p> <ol style="list-style-type: none"> <li>1. <b>Clearly defined and accessible methods for public participation are provided in both long and short term planning processes, including harvest plans and operational plans;</b></li> <li>2. <b>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;</b></li> <li>3. <b>An accessible and affordable appeals process to planning decisions is available.</b></li> </ol> <p><b>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are</b></p>	<p><b>C</b></p>	<p><b>The FME does not manage public land.</b></p>
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<del>made readily available to the public.</del>		
<p><b>Principle #5: 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.</b></p>		
<p><del>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</del></p>	<p>€</p>	<p>-</p>

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<p><b>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.</b></p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> <li>• <b>documented growth rates for particular sites, and/or acreage of forest types, age classes and species distributions;</b></li> <li>• <b>mortality and decay and other factors that affect net growth;</b></li> <li>• <b>areas reserved from harvest or subject to harvest restrictions</b></li> </ul>	<p><b>C</b></p>	<p><b>The company is closely monitoring the harvest levels on its FMUs. The annual harvest and total inventory for both HRC and MRC are posted on their website at <a href="https://www.hrcllc.com/forest-inventory">https://www.hrcllc.com/forest-inventory</a></b></p> <p><b>This data shows that the total inventory on both forests has increased annually since the reporting began.</b></p> <p><b>For both HRC and MRC FMUs, the company has been updating its forest inventories, which directly support the sustained yield analyses. The inventory process for MRC is complete. As verified by staff, progress continues to be made on the new forest inventory for HRC. A contractor was hired for both inventories, and the companies continue to make a substantial investment in the project. MRC is conducting forest modelling using the new inventory data. This will be utilized in updating the Option A. After</b></p>
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<p><del>to meet other management goals;</del></p> <ul style="list-style-type: none"><li><del>• <del>silvicultural practices that will be employed on the FMU;</del></del></li><li><del>• <del>management objectives and desired future conditions.</del></del></li></ul> <p><del>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.</del></p>	<p><del>the new forest inventories of HRC is completed forest modelling using the new inventory data will be utilized to calculate the sustained yield harvest level for the sustainability analysis. At that time a new overall sustainable harvest level for the ownership will be available for use.</del></p>
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<p><del>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.</del></p> <hr/>	<p><del>C</del></p>	<p><del>Harvest levels for the last year (2021): MRC total harvest 16.2 million (AAC = 95.7 million); HRC total harvest 41.9 millions (AAC = 55.3 million). Harvest levels are consistent with the requirements of this indicator, as confirmed via harvest records and interviews with FME employees. See the reference to the data provided on the website <a href="https://www.hrcllc.com/forest-inventory">https://www.hrcllc.com/forest-inventory</a></del></p> <hr/>
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<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>Harvest operations observed during the audit reveal post-harvest stand conditions that are consistent with FME's stated objectives and with the requirements of this indicator. The company clearly has a demonstrated commitment to returning conifer stocking to desired levels. As discussed elsewhere in this report, the companies' central reliance on herbicides to reduce the presence of competing tanoaks remains a point of contention with stakeholders and, perhaps most significantly in Mendocino County, the general public.</del></p>
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<p><del>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.</del></p>	<p><b>NA</b></p>	<p><del>FME does not engage in the harvest and sale of Non-Timber Forest Products, so this Indicator is not applicable.</del></p>
<p><del>Principle #6: 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.</del></p>		

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<p><del>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.</del></p>	<p>€</p>	<p>-</p>
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<p><b>6.2.a</b> 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><b>C</b></p>	<p>RTE species on the HRC lands are generally handled through the HCP that was adopted. This document outlines survey protocols for RTE species along with the habitat conservation practices required to protect the species and their habitat. All surveys conducted are conducted by qualified biologists either those on staff or outside contractors.</p> <p>MRC managers were developing a multi-species Habitat Conservation Plan for the MRC lands; due to changes in RTE conditions unrelated to forest practices on the MRC lands, this effort was abandoned in favor of doing project specific surveys, assessment and mitigations. This is a common approach in California and does not ease requirements for surveys, monitoring, nor mitigation. In fact, some might argue it is more stringent, since there</p>
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~~are no incidental take allowances.~~

~~As part of the efforts to combine the MRC and HRC lands into a single management entity, the company updated the FMP in 2020. The updated FMP is available at the website~~

~~<https://www.hrellc.com/management-plan>~~

~~As part of this the science coordination has been combined into a single position for both MRC and HRC. Evidence on this indicator provided by the FME: "Companies conduct surveys for RTE species each year for timber operations, or for monitoring purposes. In addition, HRC conducts surveys for monitoring of species covered under the Habitat Conservation Plan (HCP). Surveys are conducted in order to avoid unauthorized take of listed species, to avoid significant~~

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~~adverse impacts under the California Environmental Quality Act (CEQA), or as part of long-term monitoring.~~

~~In 2022 (the survey season for some of the species is ongoing at this time) the Companies have surveyed for 8 species of birds, 4 species of fish, various species of mammals (bats, Point Arena Mountain Beaver), one amphibian, and a number of rare plants species (Table 1). Listing status of these species ranges from Federal and State Endangered, to California Species of Special Concern, and to Special Status Plant Species as listed by the California Native Plant Society. Detailed information on individual species and listing status is available in our Management Plan and Timber Harvesting Plans. The number of surveys varies from season to season based on the number and area of THPs, and the species of concern that are known to exist, or have the potential to~~

	<p><del>exist, in the biological assessment area for a project such as a THP.</del></p> <p><del>To date Companies have conducted a total of 9,900 individual surveys, the largest proportion of which are surveys for Northern Spotted Owls (NSO) at 91% (9,010 surveys; Table 1).</del></p> <p><del>New protected areas that have been established because of these surveys include a total of 19 NSO Activity Centers or Core Use Areas, and one new bald eagle nest buffer. At HRC individual NSO Activity Centers are given different levels of protection depending on their status (details in HCP). At MRC, protected areas for NSO are based on the individual Activity Centers, with the most biologically significant locations (e.g., a nest site) receiving Core Use Area protection per the requirements of U.S. Fish and</del></p>
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		<b>Wildlife Service guidance for avoiding take of NSO.”</b>
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<p><b>6.2.b</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 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.</p>	<p><b>C</b></p>	<p>The FME continues to manage its forestlands in overall compliance with applicable state and federal regulations regarding RTE species. Modifications in management are well documented in the HCP for HRC, the FMP for both MRC and HRC, and in specific project plans which were reviewed during the audit. Some of these include NSO core and buffer areas, MMCA's, riparian zones, and rare plant protection measures. In addition, restoration projects were viewed for riparian, grassland and oak woodland ecosystems. These plans, applications, and projects were examined during the field portion of the audit to verify compliance and practices on the FME. Species lists based on California Native Plant Society ranking of native plant species were made available during the audit. The staff is well informed and active in the</p>
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	<p><del>protection of rare, threatened and endangered species.</del></p> <p><del>Evidence on this indicator provided by the FME: “Management activities that have occurred near existing protected areas or conservation zones include timber operations (felling, yarding, loading, and hauling of logs), road construction and maintenance, vegetation management, and habitat restoration projects.</del></p> <p><del>Measures that are taken to protect RTE species, habitats, and sensitive plant communities include seasonal disturbance minimization measures for nesting birds, habitat retention buffers, and no harvest or management buffers for specific species occurrences.</del></p> <p><del>Examples of these measures include 1,000-foot or 0.25-mile disturbance minimization buffers around NSO or marbled murrelet</del></p>
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~~nesting habitat where loud noise-generating activities (e.g. large tree felling, yarder whistles) are prohibited during the breeding season. Habitat retention buffers and conservation areas are established to maintain habitat near nest sites or core use areas, for example 1,000-foot or 0.25-mile habitat buffers around NSO sites where nesting and roosting habitat is retained, and the Marbled Murrelet Conservation Areas of the HRC HCP which are large blocks of nesting habitat set-aside for species protection. Another example are the Watercourse and Lake Protection Zones (WLPZ; California Forest Practice Rules) and Riparian Management Zones (RMZ; HCP) which are established adjacent to watercourses for protection of fish habitat. In addition, smaller protected areas (e.g. 25-foot to 50-foot no-management buffers) are established surrounding rare and/or sensitive plant~~

		<b>occurrences for protection during timber harvest and other management activities.”</b>
<b>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.</b>	<b>NA</b>	<b>The FME is not managing public forests.</b>

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<p><del>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).</del></p>	<p><del>C</del></p>	<p><del>No evidence of illegal/unauthorized hunting, fishing, or trapping of wildlife on the two FMUs was observed or discovered during the audit. Hunting is controlled on the property by a permit system. There is a PLM (Private Lands Management) plan for deer in some areas which has been developed by the FME in accordance with CFWD procedures. This program requires annual reporting and is renewed every five years. Grassland habitat restoration was viewed on HRC lands in the Mattole River watershed.</del></p>
<p><del>6.3. 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.</del></p>	<p><del>C</del></p>	<p><del>-</del></p>

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<b>6.3.a. Landscape-scale indicators</b>		
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<p><b>6.3.a.1</b> The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> 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.</p>	<p><b>C</b></p>	<p>The Companies produced an analysis of vegetation types on each ownership that assessed the presence and diversity of ecosystems across each ownership using available ecosystem datasets (Mendocino and Humboldt Redwood Companies Representative Sample Area Analysis, August 2019). This analysis resulted in a comprehensive list of ecosystems present on the properties, and updated acreages for each of the RSA and HCVF protected areas. This report is available at <a href="https://www.hrllc.com/sites/default/files/inline-files/MRC_HRC_RSA_assessment_mgmt_2021.pdf">https://www.hrllc.com/sites/default/files/inline-files/MRC_HRC_RSA_assessment_mgmt_2021.pdf</a></p> <p>Many industrial forestlands are under-represented in older successional stages and the MRC/HRC lands are no exception. The history of logging on the FMUs has been one of clearcutting and even-aged management. Since</p>
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	<p><del>much of that is relatively recent in the history of the land management before HRC and MRC, there is a large proportion of the forest that is young, even-aged, second-growth. The forest management plan on the HRC/MRC FMUs, through the extensive use of single-tree and group selection, is designed to result, over time, in an uneven-aged forest with a greater presence of older/larger trees across the landscape, and not just in riparian zones. Even-aged management systems like VR and shelterwood will continue to produce younger even-aged stands in a mosaic with uneven-aged stands.</del></p> <p><del>Forests demonstrating late successional stand characteristics are and will continue to be associated with two principle components of the properties: areas already having old-growth characteristics and WLPZs which, over time, will acquire</del></p>
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~~mature/old growth forest characteristics.~~

~~HRC managers completed an eco-regional gap analysis of the extent of un-entered early and mid-successional cover associated with fire exclusion and no harvesting in meadow complexes as part of the identification of HCVF and RSA areas. The interpretation of the gap analysis was that there is an extensive network of sites with the defining attributes (i.e., old growth/late successional) that are in protected status throughout the ecoregion, predominantly on public land.~~



<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>The FME continues to demonstrate protection for rare ecological communities on the FMU.s through the establishment of conservation zones and protected areas. Some of these include HCVPs, RSAs, MMC's, NSO core and buffer areas, and WLPZ. On the HRC lands this is best demonstrated by the areas covered by the Habitat Conservation Plan. While not included in an HCP, the same types of areas have been established to maintain, enhance, or restore these areas on the MRC lands. Numerous examples of HCVP's, RSA's, NSO core and buffer areas and rare plant sites were visited during the course of the field audit to determine the protective measures had been implemented according to the plans.</del></p>
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<p><del>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 protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</del></p> <p><del>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).</del></p>	<p><b>C</b></p>	<p><del>HRC/MRC has identified Type 1 and Type 2 old growth and is effectively implementing the policy that protects or appropriately manages stands meeting the FSC definition of Type 1 and Type 2 old growth. A new report dated 3 July 3 2019 titled <i>Mattole River Watershed High Conservation Value Forest Assessment</i> used Lidar data to determine if there were any additional areas of Type 1 or Type 2 old growth present. After analysis of the Lidar data, FME staff did a ground survey to determine if there should be any additional designations. This analysis resulted in the establishment of additional HCVs and the identification of 24 acres of old growth forest.</del></p> <p><del>There are no public nor American Indian lands managed by the FME.</del></p>
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~~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).~~

~~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).~~

~~On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique~~

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~~ownership. Timber harvest is permitted in situations where:~~

~~1. Old growth forests comprise a significant portion of the tribal ownership.~~

~~2. A history of forest stewardship by the tribe exists.~~

~~2. 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.~~

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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>HRC/MRC management practices maintain, enhance and restore habitat conditions suitable for well-distributed populations of plant and animal species that are characteristic of the North Coast ecoregion (Humboldt and Mendocino Counties). This was demonstrated through the field visits and review of the HCP for HRC and the new combined HRC-MRC Management Plan. The audit team visited sites such as MMCA's, NSO core areas, HCVFs, RSAs, WLPZ, and restoration projects in riparian corridors, grasslands and oak woodlands. The FME has recently completed a new RSA analysis and a new HCVF analysis of the Mattole Watershed. These are available at <a href="https://www.hrcllc.com/management-plan">https://www.hrcllc.com/management-plan</a></b></p>
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<p><b>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</b></p> <ul style="list-style-type: none"> <li>a) _____ habitat for aquatic species that breed in surrounding uplands;</li> <li>b) _____ habitat for predominantly terrestrial species that breed in adjacent aquatic habitats;</li> <li>c) _____ habitat for species that use riparian areas for feeding, cover, and travel;</li> <li>d) _____ habitat for plant species associated with riparian areas; and,</li> <li>e) _____ stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</li> </ul>	<p><b>C</b></p>	<p><b>The California Forest Practices Rules (CFPR) require all forest management operations to comply with WLPZ protection as specified in the regulations. Compliance with these regulations results in management of watercourse zones in a manner that demonstrates conformity to this indicator. The FME further demonstrates conformance to this indicator through compliance with the special WLPZ requirements of the HCP covering large portions of the HRC forestlands.</b></p> <p><b>The storm proofing of roads as they are accessed for operations is an excellent example of how the FMU is enhancing and restoring aquatic habitat by significantly reducing future sediment delivery off the road systems, most of which are from previous logging operations prior to current road standards. The new</b></p>
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~~HRC-MRC Management Plan makes the road standards uniform over both of the FMU's. Rehabilitation of these legacy logging roads is a major factor in reducing future sediment yields from the legacy roads. Some of the practices include disconnecting road drainage from streams, installing rolling dips and outsloping, rocking rolling dips and crossing inlets and outlets, upgrading culverts to the 100-year storm size, and mulching of bare soil areas prior to the winter season.~~

~~Stream restoration projects were visited during the audit along the Elk River watershed. These projects are designed to reduce sediment input and restore habitat.~~

<p><b>Stand-scale Indicators</b></p> <p><b>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.</b></p>	<p><b>C</b></p>	<p><b>The FME has developed and implemented a vegetation management plan which is available on the FME website.</b></p> <p><b><u><a href="https://www.hrcllc.com/sites/default/files/inline-files/Redwood%20Company%20Vegetation%20Management%20Policy_v1_1.pdf">https://www.hrcllc.com/sites/default/files/inline-files/Redwood%20Company%20Vegetation%20Management%20Policy_v1_1.pdf</a></u></b></p> <p><b>The FME has also developed and implemented a new forest management plan that encompasses both FMU's</b></p> <p><b><u><a href="https://www.hrcllc.com/sites/default/files/inline-files/HRC-MRC-ManagementPlan-Final-072121.pdf">https://www.hrcllc.com/sites/default/files/inline-files/HRC-MRC-ManagementPlan-Final-072121.pdf</a></u></b></p> <p><b>On page 1 of the HRC-MRC Management Plan there is a statement of the vision for management as follows:</b></p> <p><b>“Managing forestland with a high degree of environmental stewardship means that with each decade of management:</b></p>
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~~▲ Our management practices will maintain and improve stand conditions for conifer growth and yield, and carbon sequestration.~~

~~▲ The inventory of redwood, Douglas-fir, and other native conifer trees will increase.~~

~~▲ Wildlife and fisheries habitat will be maintained and improved.~~

~~▲ Soil resources and water quality will benefit from silviculture and harvest practices, including “Restore tree species composition to pre-1850 conditions where stand composition has been altered.”~~

~~This new plan is a very clear indicator of the intent of the FME to meet the intent of this indicator.~~

<p><del>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.</del></p>	<p><b>C</b></p>	<p><del>The FME is in conformance with the requirements of this indicator—planting stock is of local origin. Only native species suited to the FMU are selected for planting. Seedlings and clones are both utilized when planting is used to supplement natural regeneration on the FMU. There is mixing of source between HRC and MRC when the stock from one area is better suited, for example in some of the inland areas of HRC, clonal redwood stock from MRC sources has been determined to be better suited to the site and has been utilized.</del></p> <p><del>Douglas fir and redwood seed is all from local collections on MRC and HRC lands. Clonal stock is all from scions collected on MRC and HRC lands.</del></p>
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<p><b>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:</b></p> <p>a) <b>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></p> <p>b) <b>vertical and horizontal complexity.</b></p> <p><b>Trees selected for retention are generally representative of the dominant species found on the site.</b></p>	<p><b>C</b></p>	<p><b>Large live trees, including those with decay and declining health, snags and well-distributed coarse woody debris are retained through the use of selection silviculture practiced on the FMU. This occurs in both harvest areas and, just as importantly, watercourse protection zones and special protection areas, such as NSQ cores and MMCAs, the FME's practices are effective in retaining these habitat components and stand structures.</b></p> <p><b>The FME's old growth policies assure that legacy trees, which the FME refers to as Old-Growth Trees, are identified and protected. While these individual trees are not mapped, numerous examples of retention of such trees were observed during the field audit. These represent one of the key habitat elements to retain, recruit and protect. Included</b></p>
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~~on page 18 of the HRC-MRC MP is the policy: “We will preserve individual old growth trees, both conifers and hardwoods, which have significant habitat values and provide unique biological function within the forest. These old growth trees are remnant trees from the primary forest, established prior to the year 1800 which will be difficult, if not impossible to replace.”~~

~~All retained trees within harvest units were observed to be representative of the dominant species found on the site.~~

<p><b>6.3.g.1</b> 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</p>	<p><b>C</b></p>	<p>HRC/MRC does not employ the even-aged management technique of clear-cutting, as is stated in the HRC-MRC MP and was confirmed via field observation and review of THPs. The silvicultural methods utilized, selection, group selection, transition, rehabilitation, and variable retention are all partial-cut methods and retain basal area of both the crop tree conifers and the native hardwoods. This retention can either be dispersed or aggregated.</p> <p>Where conditions indicate even-aged management would be a better solution than uneven-aged management, such as in some Douglas-fir stands, the FME may employ even-aged silviculture. This is indicated in the HRC-MRC MP on Page 11: "Shelterwood and seed tree silviculture are very similar and are used on our non-redwood sites where Douglas-fir is most</p>
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<p><b>regional requirements and guidance.</b></p>	<p><b>ecologically appropriate species. The harvest occurs usually in two (sometimes three) stages. The first harvest retains enough mature trees to provide seed and/or shelter to the newly established trees in the post-harvest stand. The second harvest will remove the mature trees at a future point (10-15 years) when the new trees are well established. In some cases, these steps may be preceded by an entry which removes 10-15% of the mature trees to reduce wind damage during the main harvest operation."</b></p>
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<p><del>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:</del></p> <ol style="list-style-type: none"> <li><del>1.— Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture).</del></li> <li><del>2.— Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU.</del></li> <li><del>3.— Is spatially and temporally explicit and includes maps of proposed openings or areas.</del></li> <li><del>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,</del></li> </ol>	<p><b>C</b></p>	<p><del>HRC/MRC timber harvest plans do not entail opening sizes that exceed the limits described in Indicator 6.3.g.1. The largest openings would be where variable retention using aggregate retention is applied. None of the VR units observed exceeded the opening size limits.</del></p>
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~~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><del>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</del></p> <ol style="list-style-type: none"> <li><del>1. _____ a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</del></li> <li><del>2. _____ implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</del></li> <li><del>3. _____ eradication or control of established invasive populations when feasible; and,</del></li> <li><del>4. _____ monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</del></li> </ol>	<p><b>C</b></p>	<p><del>The FME’s approach to management of invasive species is included in the vegetation management plan and the HRC-MRC-MP on the website:</del></p> <p><del><a href="https://www.hrllc.com/management-plan">https://www.hrllc.com/management-plan</a></del></p> <p><del>“We prioritize management of invasive species with the highest potential for significant impacts to sensitive species habitat, HCVFs, and RSAs. The following species or groups of organisms have been identified as the greatest threats to ecosystem function in these areas, and the highest priority for monitoring and potential management actions aimed at reducing growth or spread. Monitoring high-priority invasive species is facilitated by recording observations in a GIS dataset.”</del></p> <p><del>The plan includes a list of specifically targeted invasive</del></p>
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	<p>plants that may prohibit achieving forest management goals. Control of most wanted invasive species with a high priority on highly-utilized roads or populations likely to spread into forest management units.” These include (<i>Genista monspessulana</i> and <i>Cytisus scoparius</i>), pampas grasses (<i>Cortaderia jubata</i> and <i>C. selloana</i>) and gorse (<i>Ulex europaeus</i>). Small, targeted areas continue to be treated with herbicides or manually each year to control local invasions. Because of the primary use of selection harvesting systems on HRC/MRC lands, the invasion potential of these species is relatively low. Control continues to be mainly directed at road edges and group selection sites adjacent to roads.</p>
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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>The risk of wildfire has been low historically across HRC's and MRC's coastal properties, while the fire risk on the more inland properties is generally higher. Climate change induced increases in mean temperatures and changes in historical precipitation patterns are increasing fire risk throughout California, even in the coastal counties, as is evidenced by the number of particularly large and damaging wildfires in the past few years. This has created a heightened awareness in the public of the dangers of wildfire and the need to reduce fire risk.</b></p> <p><b>Standard measures to assist in case of wildfire are taken, such as keeping access roads open and ensuring all harvests have required (by Cal Fire) fire-fighting tools onsite during active harvesting operations. All active operations visited during the 2021 audit had the prescribed fire box onsite.</b></p>
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~~The new vegetation management policies and plans include a section specifically on fuel reduction treatments on page 21: “The companies must consider existing and future fire hazard when deciding where to make vegetation management investments. Factors such as public road access, neighbors, adjacent fuel types that inherently have a high risk of fires, and power lines increase fire hazard. When deciding among equal treatments, priority should be given to those projects with reduced fire hazard.”~~

~~Evidence provided by the FME: “MRC recently received a grant to complete conifer thinning to reduce catastrophic wildland fire risk. MRC is working with the grant funder (CalFire) to sign the grant contracts.~~

		<p><del>HRC: Conducted a 5-acre prescribed burn in the Mattole Tract (Rainbow Ranch THP) last fall (2021). Conducted three (3) forest fuels reduction commercial harvest projects over the last 7 months including one currently active on Monument Ridge above HWY 101 (Approximately 650 acres total). Grinded approximately 6,000 green tons of slash piles in the Yager and Elk River tracts to reduce forest fuel loading, sent this material to the HSC power plant for energy production. Burned approximately 500 slash piles last fall/winter for fuels reduction"</del></p>
<p><del>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</del></p>	<p><del>€</del></p>	<p><del>-</del></p>

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- Commented [SB2]: The document her goes from 6.3 to 6.9 - 6.4 - 6.8 are not covered. I would think at least 6.4 should be covered since it is the one CAR associated with this audit.

<p><del>6.9.a The use of exotic species 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.</del></p>	<p><del>NA</del></p>	<p><del>There is no use of exotic species on either MRC or HRC FMUs for management or commercial purposes, as confirmed in interviews with staff.</del></p>
<p><del>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.</del></p>	<p><del>NA</del></p>	
<p><del>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</del></p>	<p><del>NA</del></p>	
<p><del>Principle #7: 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.</del></p>		

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<p><b>7.1. The management plan and supporting documents shall provide:</b></p>	<p>€</p>	<p>-</p>
<p>a. <del>Management objectives—description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</del></p>		
<p>b. <del>Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</del> d) <del>Rationale for rate of annual harvest and species selection.</del> e) <del>Provisions for monitoring of forest growth and dynamics.</del> f) <del>Environmental safeguards based on environmental assessments.</del> g) <del>Plans for the identification and protection of rare, threatened and endangered species.</del></p>		
<p>b) <del>h) Maps describing the forest resource</del></p>		

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<p><del>base including protected areas, planned management activities and land ownership.</del></p> <p><del>i) Description and justification of harvesting techniques and equipment to be used.</del></p>		
<p><del>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.</del></p>	<p><b>C</b></p>	<p><del>Legal ownership and formal property descriptions are a mandatory component of every THP.</del></p> <p><del>John Kuhry, asset manager, maintains a database with all property rights held by other parties (reviewed during the audit).</del></p>

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<p><del>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).</del></p>	<p><del>C</del></p>	<p><del>Current forest types are listed on pg 4-5 of the management plan.</del></p> <p><del>Size class/successional stages, are included in forest inventory section.</del></p> <p><del>THPs include detailed assessment of the impacts of past land use on individual plan areas in the cumulative impact section of the individual THP.</del></p>
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<p><b>7.1.c The management plan describes:</b></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>	<p><b>C</b></p>	<p><b>Desired future conditions are generally discussed in the section titled Timber Management Objectives of the HRC Management Plan.</b></p> <p><b>The objectives of the MRC FMU are described in the 'Our Vision' section of the FMU's management plan.</b></p> <p><b>Current conditions and desired future conditions of timber are included in the Option A.</b></p> <p><b>Historic ecological conditions are found in the RSA report.</b></p> <p><b>Specific silvicultural prescriptions designed to move individual stands toward desired future conditions are presented in THPs.</b></p>
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<p><del>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.</del></p>	<p><b>C</b></p>	<p><del>The Habitat Conservation Plan for the HRC FMU incorporates landscape-level considerations and analysis into habitat conservation planning.</del></p> <p><del>Pgs 4-5 landscape description. Neighboring land use 7.2.3</del></p> <p><del>Section 6.2.2 describes forest structure.</del></p> <p><del>6.1—Old-growth discussion</del></p> <p><del>6.2 of the management plan includes an overview of terrestrial habitat and wildlife.</del></p> <p><del>Habitat features necessary for supporting threatened species are also described in the HCP.</del></p>
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<p><b>7.1.e The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</b></p> <ul style="list-style-type: none"> <li>• <b>_____ rare, threatened, or endangered species and natural communities (see Criterion 6.2);</b></li> <li>• <b>_____ plant species and community diversity and wildlife habitats (see Criterion 6.3);</b></li> <li>• <b>_____ water resources (see Criterion 6.5);</b></li> <li>• <b>_____ soil resources (see Criterion 6.3);</b></li> <li>• <b>_____ Representative Sample Areas (see Criterion 6.4);</b></li> <li>• <b>_____ High Conservation Value Forests (see Principle 9);</b></li> <li>• <b>_____ Other special management areas.</b></li> </ul>	<p><b>C</b></p>	<p><b>The HRC FMU's HCP is an extensive planning and monitoring document that ensures environmental safeguards are implemented. The HCP covers 17 species of listed RTE animals, and conservation measures for population and habitat protection. Conservation measures for rare and sensitive plant species are also covered in the HCP. Water resources are covered in the HCP Aquatics Conservation Plan and Watershed Analysis provides assurance that water resources are adequately monitored and protected. HCVFs are described in section 6.5 of the management plan, as well as supporting HCV documentation.</b></p> <p><b>CNPS has online map for updated vegetation surveys. Each harvest plan is individually reviewed for RTE species. There is a list of 23</b></p>
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	<p><del>plant species they survey for, only 9 ever found on the property. They have programmatic mitigation plans.</del></p> <p><del>Currently working with CDFW on sensitive natural community survey. Since California doesn't have an overlay of sensitive communities, HRC working to identify these plant communities. Redwood/doug fir alliance is most common.</del></p> <p><del>Botanical assessments occur for THPs and road construction.</del></p> <p><del>Water resources are extensively described in watershed analysis reports.</del></p>
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<p><del>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).</del></p>	<p><b>C</b></p>	<p><del>Invasive species are described in section 6.7 of the management plan.</del></p> <p><del>Herbicide use is described in the company's Vegetation Management Policy, Policy Implementation Plan, and Effectiveness Monitoring Plan. The document describes in detail vegetation management activities on Mendocino and Humboldt Redwood Companies timberland. The requirements in this indicator are also described included in this document.</del></p> <p><del>Currently in consultation with CDFW over control of jutuba grass.</del></p> <p><del>The company has a lead botanist, who will do record search and GIS search of known sites for THPs and pesticide applications. Survey crews have trainings for rare plants. Staff are provided</del></p>
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		<p>with a rare plant handbook, and a rare plant of the month is featured in internal communication.</p> <p>Have begun using a quick-capture app, mapping function app for most noxious plant invaders. Drops a gps point for new locations of invasive species. Have one location of jubata grass, removal from wetland area by hand.</p>
<p><b>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).</b></p>	<p>€</p>	<p>Forest pests and disease are rare in the redwood region, primarily limited to Sudden Oak Death. Management plan describes this in section 6.7.2.</p> <p>‡</p>

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<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>Herbicide use is described in section 5.5 of the management plan. oThe company's Vegetation Management Policy, Policy Implementation Plan, and Effectiveness Monitoring Plan describe in detail the chemicals used and applications. Extensive records are kept by company on chemical applications each year in conformance with Criterion 6.6.</del></p>
<p><del>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.</del></p>	<p><del>NA</del></p>	<p><del>Biological control agents are not used.</del></p>

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<p><b>7.1.j The management plan incorporates the results of the evaluation of social impacts, including:</b></p> <ul style="list-style-type: none"> <li>• <b>_____ traditional cultural resources and rights of use (see Criterion 2.1);</b></li> <li>• <b>_____ potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2);</b></li> <li>• <b>_____ management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5);</b></li> <li>• <b>_____ management of aesthetic values (see Indicator 4.4.a);</b></li> <li>• <b>_____ public access to and use of the forest, and other recreation issues;</b></li> <li>• <b>_____ local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators</b></li> </ul>	<p><b>C</b></p>	<p><b>Section 7.2 of the management plan, describes social impacts and how they are addressed in management activities. This includes community values such as domestic water sources, public access for recreation, aesthetic considerations, and neighborhood notification of activities. The identification and protection of Native American archeological sites are described on pages. The plan also describes the company's economic contributions to the location community through employment and donations.</b></p> <p><b>Each THP includes a confidential archeological addendum describing surveys and any resulting archeological and historic sites found within the plan area including any sites of</b></p>
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<p><del>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).</del></p>		<p><del>cultural or ceremonial significance.</del></p>
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<p><b>7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</b></p>	<p><b>C</b></p>	<p><b>Both HRC and MRC FMUs have a Roads Management Plan which incorporates the transportation plan, construction standards and management, inspections, maintenance, road monitoring, and reporting. The HRC HCP also includes explicit requirements for road monitoring and maintenance to ensure soil erosion or sediment delivery is mitigated.</b></p> <p><b>Roads management plan for HRC is included in the HCP. Is there something for MRC? Road resource. 6.3.1, 6.3.2.</b></p> <p><b>Under the HCP there is an annual road inspection program, and also triggered by storms of certain size. Every erosion control site inspected every year. Company has a MATO with water quality control board. department, inspection for</b></p>
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		<p><b>road systems, crossing designs.</b></p>
<p><b>7.1.1 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.</b></p>	<p><b>C</b></p>	<p><b>Specific silvicultural practices implemented for each harvest are a required component in each THP. The FME's foresters use a decision tree to determine the best silvicultural treatment for each stand.</b></p> <p><b>Silvicultural practices are described generally in the management plan in Section 5.1.</b></p>

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<p><b>7.1.m The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.</b></p>	<p><b>C</b></p>	<p><b>Inventory, growth modeling and subsequent harvest planning is described beginning on page 11 of the HRC FMU management plan. Harvest planning is described in detail in the Sustainability Analysis under which HRC currently operates.</b></p> <p><b>Chapter 2 and Appendix A (Landscape Planning and Sustainability Units) of the MRC FMU management plan includes descriptions of the inventory system and harvest rate calculations.</b></p> <p><b>The company is currently undergoing a new Option A process for both properties. HRC is operating under an older option A, with a new demonstration of sustained yield.</b></p> <p><b>MRC has a current Option A, but they have revised it and</b></p>
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~~voluntarily resubmitted it to CalFire, looking to update the silvicultural sections.~~

~~California Forest Practice Rules have different options to demonstrate sustained yield. Landowners over 50k acres need either a Sustained Yield Plan or Option A, which includes a growth model of the different timber types. The plan addresses effects of harvest on resources, plant, water quality. The plan functions as a cumulative effects analysis. The company is in the process of moving its inventory modeling to a new program (FVS), that better accounts for their uneven aged systems. Overall, actual harvests are well below the modeled sustained yield amount, because not all volume is economically feasible to reach.~~

<p><b>7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.</b></p>	<p><b>C</b></p>	<p><b>Monitoring procedures are summarized in Section 8 of the management plan, as well as in the documents for each monitoring program.</b></p>
<p><b>7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.</b></p>	<p><b>C</b></p>	<p><b>The FME’s harvest activities are covered by site-specific THPs. These management plans contain site-specific maps detailing the management units planned for active management, road systems, water course buffer areas, sensitive habitats and erosion areas in sufficient detail to ensure sensitive sites are protected and activities are carried out in accordance with plan objectives. Both management plans contain general resource base maps.</b></p> <p><b>Larger maps are available in the management plan and the HCV assessment documents.</b></p>

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<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>Each THP describes harvest machinery under Section II. All harvest techniques are chosen to mitigate impacts to the residual stand.</del></p>
		<p><del>Management plan section 5.3.2 discusses logging methods.</del></p>
<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>The FME completes the required TI process for all their timber harvest, ensuring conformance to this indicator.</del></p>

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<p><del>7.1.r The management plan describes the stakeholder consultation process.</del></p>	<p>€</p>	<p><del>Stakeholder consultation is described in the management plan, section 7.2.1. Public comment is also a mandatory component of THP approval and the process is described on the CAL FIRE website.</del></p>
<p><del>7.2 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.</del></p>	<p>€</p>	<p>-</p>
<p><del>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.</del></p>	<p>€</p>	<p><del>The management plan underwent a major overhaul in 2021, as the two separate plans were combined into a single plan.</del></p>

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<p><del>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</del></p>	<p><del>C</del></p>	<p><del>-</del></p>
<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>Both forest management plans describe training practices for staff and contractors. Review of staff training records demonstrated compliance with this indicator, as did interviews with in-woods contractors and the quality of work observed.</del></p> <p><del>Reviewed safety training meeting records Dec 17, 2021, safe winter driving, hazard communication, monthly safety meeting, etc.</del></p> <p><del>However, see discussions for findings 2022.1 and 2022.2.</del></p>

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<p><del>7.4 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.</del></p>	<p><del>C</del></p>	<p><del>-</del></p>
<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>All of the FME's management practices and harvests are covered by THPs, which adequately describe the elements covered in Criterion 7.1. These plans are public documents available on the CAL FIRE website. The general HRC and MRC FMU management plans are available in full on the company website.</del></p>

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<p><del>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.</del></p>	<p><del>NA</del></p>	<p><del>This is not a public forest.</del></p>
<p><del>Principle #8: 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.</del></p> <p><del><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></del></p>		

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<p><b><del>8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</del></b></p>	<p>€</p>	<p>-</p>
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<p><b>8.1.a Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.</b></p>	<p><b>C</b></p>	<p><b>Overall, the FME engages in an extensive and robust array of monitoring activities, most with sufficient documentation to inform management decisions, over time. The strongest example of monitoring in accordance with a regular, comprehensive and replicable written protocol is the Habitat Conservation Plan on substantial portions of the HRC FMU. Other types of monitoring, such as related to aquatic/riparian issues in key watercourses are also quite developed and well documented on both the HRC and MRC FMUs. Additionally, the FME makes available to the public many of the monitoring results on its website.</b></p>
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<p><b>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.</b></p>	<p>€</p>	<p>-</p>
<p><b>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.</b></p>	<p>€</p>	<p><b>The FME maintains and utilizes the results of extensive forest inventory systems on both FMUs, covering the subject matters in this indicator. As mentioned elsewhere in this report, the FME is in the process of updating its forest inventory and will eventually conduct forest modeling across both FMUs and have a unified management plan.</b></p>

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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>The FME’s database and inventory systems allow for inclusion of unanticipated loss. Some losses from Sudden Oak Death to tanoak have been noted. Generally, the redwood/mixed conifer forests of the North Coast are not particularly vulnerable to productivity losses due to mortality or factors adversely impacting growth—with the impacts of excessive presence of tanoak being a very notable exception.</b></p> <p><b>Unanticipated loss from wildfires are more likely in the region, although the FMUs have not been significantly affected by wildfires in recent years. Any such loss would be recorded in the FME’s monitoring systems.</b></p>
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<p><del>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.</del></p>	<p><del>C</del></p>	<p><del>Detailed records of timber harvesting are maintained, with appropriate feedback loops to long term harvest planning. No NTFPs are commercially harvested.</del></p>
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<p><b>8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</b></p> <ol style="list-style-type: none"> <li>1) <b>Rare, threatened and endangered species and/or their habitats;</b></li> <li>2) <b>Common and rare plant communities and/or habitat;</b></li> <li>3) <b>Location, presence and abundance of invasive species;</b></li> <li>4) <b>Condition of protected areas, set-asides and buffer zones;</b></li> <li>5) <b>High Conservation Value Forests (see Criterion 9.4).</b></li> </ol>	<p><b>C</b></p>	<p><b>The FME continues to undertake considerable effort to gather information and data pertinent to all 5 subject categories enumerated in this indicator. The HRC FMU's HCP requires the extensive collection of data for RTE species, in particular.</b></p> <p><b>Some examples include an effectiveness monitoring program for rare plant communities. All THPs are revisited in 1 and 3 year period after completion. For occurrences outside of a THP, they will do periodic surveys to see if the communities are maintained. For example, a 20% annual survey on Humboldt milk vetch.</b></p>
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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>Through an array of processes ranging from the HCP covering substantial portions of the HRC FMU to California FPA regulatory mandates to the FME's own commitment to understanding and acting upon the impacts and results of management activities, managers at all levels in the organization demonstrate a commitment to properly and effectively implementing planned operations.</b></p>
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<p><b>8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest road system.</b></p>	<p><b>C</b></p>	<p><b>The FME engages in a robust array of monitoring activities focusing on resource conditions and the environmental impacts of site disturbing activities related to commercial forestland management—harvesting, vegetation management, road system maintenance, protection of special values and resources. Monitoring ranges from the highly structured and documented (such as HCP monitoring on the HRC FMU) to less formal active monitoring such as achieved through engagement with stakeholders. However, the FME has implemented a stakeholder monitoring system to more formally document such interactions.</b></p>
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<p><del>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).</del></p>	<p><del>C</del></p>	<p><del>The majority of FME employees are longstanding residents of the North Coast and, as such, are integrated and knowledgeable about relevant socio-economic issues such as community attitudes and reactions to site disturbing activities— particularly timber harvesting and vegetation management using herbicides. Additionally, the FME measures its economic impact to communities, such as the number of people that it employs and the financial contributions it makes to local community initiatives.</del></p>
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<p><b>8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.</b></p>	<p><b>C</b></p>	<p><b>As part of the timber harvest plan notification process, stakeholders are required to be notified. The FMU tracks inputs received. They also have developed specific responses to key stakeholder groups, especially in the Elk River, Freshwater Creek, and Mattole watersheds. These responses are posted on their public website. The FME has a system for more closely tracking stakeholder input and responses to that input.</b></p>
<p><b>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).</b></p>	<p><b>C</b></p>	<p><b>Operating in compliance with the California Forest Practice Regulations, which the FME has a demonstrated track record of doing, assures that sites of cultural significance to Native Americans are identified and protected as part of timber harvest planning. Tribal representatives are informed of all known archeological and cultural sites and offered opportunities to provide input in their protection,</b></p>

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<p><del>8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.</del></p>	<p>€</p>	<p><del>Interviews with FME executives and managers confirm that the financial performance of the two companies (HRC &amp; MRC) is a strong and ongoing focus.</del></p>
<p><del>8.3 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."</del></p>	<p>€</p>	<p>-</p>
<p><del>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.</del></p>	<p>€</p>	<p><del>The FME carefully tracks products sold from the FMU. It utilizes a trip ticket system; tickets indicating the FSC 100% claim and appropriate certificate code are affixed to each load that leaves the FMU. Copies of the ticket are provided to the scaler at the mill, to the logger, and to the FME. The FME reconciles scaled volume upon receipt, and payments to contractors are made accordingly based on volume, as specified in the logging contract.</del></p>

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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>Trip tickets and logging contracts enables tracing harvested materials from the THP level to the mill.</b></p>
<p><b>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b></p>	<p><b>C</b></p>	<p>-</p>
<p><b>8.4.a The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.</b></p>	<p><b>C</b></p>	<p><b>FME personnel engage in an extensive array of forest monitoring activities that collectively feed into the management plans and the assessment of plan attainment and that constitute conformance to this indicator. The company website includes information on management plans and monitoring.</b></p>

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<p><del>8.4.b Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.</del></p>	<p><del>C</del></p>	<p><del>Interviews with FME managers and field personnel confirm that the two FMUs are managed in an adaptive manner where the results of monitoring activities and assessments of the efficacy of management practices regularly contribute to revisions in management approaches and, eventually, in management plans through regular updates.</del></p>
<p><del>8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</del></p>	<p><del>C</del></p>	<p><del>-</del></p>

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<p><del>8.5.a While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</del></p>	<p><b>C</b></p>	<p><del>Annual monitoring reports are made publicly available on the company website. Most monitoring reports also have a required public agency review period.</del></p>
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~~Principle #9: 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.~~

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~~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~~

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~~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).~~

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~~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)**

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### North Woods/Lake States:

- **Old growth – (see Glossary) (a)**

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- ~~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)~~

~~*Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.*~~

~~*In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.*~~

~~*Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing*~~

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~~abundance of old trees and (2) the landscape and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.~~

~~Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVPs and may be harvested under special plans that account for the ecological attributes that make it an HCVP.~~

~~Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.~~

9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.

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<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>HRC/MRC continues to monitor its identified HCVF on a routine basis. For example, any Type 1 or 2 old growth not already identified is assessed during pre-harvest reviews. Spotted owl surveys are ongoing as part of their habitat conservation plan.</b></p>
<p><b>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.</b></p>	<p><b>C</b></p>	<p><b>As evidenced, for instance, by ongoing dialogue with environmental stakeholders in the Mattole River watershed, FME field foresters and managers demonstrate a willingness to consider input and to adjust or modify protection measures designed to maintain or enhance high conservation values if assessments confirm that measures to maintain or enhance HCV attributes is needed.</b></p>

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~~Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table~~

~~Chain of Custody indicators were not evaluated during this evaluation.~~

~~Appendix 7 – Trademark Standard Conformance Table~~

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## 1. General Requirements for Use of the FSC Trademarks

(FSC “checkmark and tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)

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**Trademark uses reviewed:**

<b>Trademark Application (on-product/promotional)</b>	<b>Case Approval #, or Email (include approver name &amp; date), or other appropriate documentation</b>	<b>Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.)  If not, describe in Nonconformities below.</b>
<b>Promotional Article (Home Depot Eco Actions Blog Post)</b>	<b>336766</b>	<b><input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/></b>
<b>Promotional Article (Home Depot Eco Actions Blog Post)</b>	<b>355302</b>	<b><input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/></b>
<b>Promotional Advertisement</b>	<b>357485</b>	<b><input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/></b>
<b>Promotional Advertisement</b>	<b>359219</b>	<b><input checked="" type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/></b>

All known uses reviewed.

Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met:

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~~The samples selected are materials with the FSC Trademark that are most commonly accessed by the public. Additionally, as an annual surveillance evaluation, a smaller sample of FSC Trademark uses was selected than would be during a recertification evaluation.~~

~~Trademark uses detected include those grandfathered in under prior FSC trademark rules (e.g., FSC TMK 50-201). Place the initials "GF" by the specific Trademark Applications above. Note: This only applies to printed items or physical promotional materials (e.g., hats, load tickets) in stock. New printings, items, and websites must be updated per FSC STD 50-001 requirements. If the organization only has GF uses and no new uses, the rest of this checklist is NA.~~

**1.2 Trademark License Agreement and valid certificate**

~~In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate.~~

~~*Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.*~~

**Maintained on file by SCS Main Office**

~~Evidence 1.2: Maintained on file by SCS Main Office.~~

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<p><del><b>1.6 Product Group List</b></del></p> <p><del>The products intended to be labeled or promoted as FSC certified have been included in the organization's certified product group list.</del></p>	<p><input checked="" type="checkbox"/> <del>C</del></p> <p><input type="checkbox"/> <del>NC</del></p> <p><input type="checkbox"/> <del>C w/ OBS/ c/ OBS</del></p>
<p><del>Evidence 1.6: <input checked="" type="checkbox"/> Refer to Product Groups List in Public Summary Report;</del></p> <p><del><input type="checkbox"/> The following nonconformance(s) were detected in Product Groups: _____; or</del></p> <p><del><input type="checkbox"/> Refer to OBS related to Product Groups: _____</del></p>	
<p><del><b>1.3 Trademark License Code</b></del></p> <p><del>The FSC trademark license code assigned by FSC to the organization accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</del></p>	<p><input checked="" type="checkbox"/> <del>C</del></p> <p><input type="checkbox"/> <del>NC</del></p> <p><input type="checkbox"/> <del>C w/ OBS/ c/ OBS</del></p>

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### 1.4 Trademark Symbol

The FSC logo and the 'Forests For All Forever' marks shall include the trademark symbol® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered.

For use in a country where the trademark is not yet registered, use of the symbol™ is recommended. The Trademark Registration List document is available in the FSC trade mark portal and marketing toolkit.

The symbol® shall also be added to 'FSC' and 'Forest Stewardship Council' at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure).

*NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.*

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NA, one or more of noted exceptions applies

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**2.1 Restrictions on using FSC trademarks**

**The organization has not used the FSC trademarks in the following ways:**

- a) \_\_\_\_\_ in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme;
- b) \_\_\_\_\_ in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the organization, outside the scope of certification;
- c) \_\_\_\_\_ to promote product quality aspects not covered by FSC certification;
- d) \_\_\_\_\_ in product brand or company names, such as ‘FSC Golden Timber’ or website domain names;
- e) \_\_\_\_\_ in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.

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<p><b>2.2 Translations</b></p> <p>The name 'Forest Stewardship Council' has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)</p>	<p><input type="checkbox"/> C</p> <p><input type="checkbox"/> NC</p> <p><input type="checkbox"/> C w/ OBS/ c/ OBS</p> <p><input checked="" type="checkbox"/> NA, no translations</p>
<p><del>Evidence 1.3, 1.4, 2.1, and 2.2:</del> <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above;</p> <p><input type="checkbox"/> The following nonconformance(s) were detected _____; or</p> <p><input type="checkbox"/> Refer to OBS: _____</p>	
<p><del>Sections 8 and 9 Graphic Rules</del></p> <p>The organization has only used FSC logos that conform to the standard requirements governing:</p> <ul style="list-style-type: none"> <li>• _____ color and font (8.1-8.3);</li> <li>• _____ format and size (8.4-8.9);</li> <li>• _____ label placement (8.10); and</li> <li>• _____ 'Forests For All Forever' marks (9.1-9.7).</li> </ul>	<p><input checked="" type="checkbox"/> C</p> <p><input type="checkbox"/> NC</p> <p><input type="checkbox"/> C w/ OBS/ c/ OBS</p>

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<p><b>1.5 Trademark Use Approval</b></p> <p><del>The organization has submitted all intended uses of the FSC trademarks to SCS for approval.</del></p> <p><b>OR</b></p> <p><del>The organization has an approved trademark use management system in place. (If the organization has a trademark use management system, complete Annex A.)</del></p>	<p><input checked="" type="checkbox"/> <del>C</del></p> <p><input type="checkbox"/> <del>NC</del></p> <p><input type="checkbox"/> <del>C w/ OBS/ c/ OBS</del></p>
<p><del>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</del></p>	<p><input type="checkbox"/> <del>C</del></p> <p><input type="checkbox"/> <del>NC</del></p> <p><input type="checkbox"/> <del>C w/ OBS/ c/ OBS</del></p> <p><input checked="" type="checkbox"/> <del>NA, trademarks no used for segregation marks</del></p>
<p><del>Evidence Graphic Rules, 1.5, and 4.6: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above;</del></p> <p><del><input type="checkbox"/> The following nonconformance(s) were detected _____; or</del></p> <p><del><input type="checkbox"/> Refer to OBS: _____</del></p>	

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## ~~2. On-Product Use of FSC Trademarks~~

~~NA, no use of on-product trademarks (on-product checklist may be deleted)~~

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## ~~3. Promotional Use of FSC Trademarks~~

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<p><b>6.1 Catalogues, Brochures, and Websites</b></p> <p><b>When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</b></p> <ul style="list-style-type: none"> <li>It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc.</li> <li>If both FSC-certified and uncertified products are listed then a text such as "Look for our FSC®-certified products" shall be used next to the promotional elements and the FSC-certified products shall be clearly identified.</li> <li>If some or all of the products are available as FSC-certified on request only, this is be clearly stated.</li> </ul>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> C</li> <li><input type="checkbox"/> NC</li> <li><input type="checkbox"/> C w/ OBS/ c/ OBS</li> <li><input type="checkbox"/> NA, not using trademarks in catalogues/ brochures/websites</li> </ul>
<p><b>6.2 Sales and Delivery Documents</b></p> <p><b>When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: "Only the products that are identified as such on this document are FSC certified".</b></p> <p><b>NOTE: Use of the FSC claim and certificate code on the invoices does not qualify as FSC trademark use.</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> C</li> <li><input type="checkbox"/> NC</li> <li><input type="checkbox"/> C w/ OBS/ c/ OBS</li> <li><input checked="" type="checkbox"/> NA, not using trademarks on templates for FSC &amp; non-FSC products</li> </ul>

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<p><b>6.3 Promotional Items</b></p> <p>All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.</p>	<p><input type="checkbox"/> C</p> <p><input type="checkbox"/> NC</p> <p><input type="checkbox"/> C w/ OBS/ c/ OBS</p> <p><input checked="" type="checkbox"/> NA, not labeling promotional items</p>
<p><b>6.5 Trade Fairs</b></p> <p>When the FSC trademarks are used for promotion at trade fairs, the organization has:</p> <p>a) _____ clearly marked which products are FSC certified, or</p> <p>b) _____ add a visible disclaimer stating “Ask for our FSC® certified products” or similar if no FSC certified products are displayed.</p> <p><i>NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.</i></p>	<p><input type="checkbox"/> C</p> <p><input type="checkbox"/> NC</p> <p><input type="checkbox"/> C w/ OBS/ c/ OBS</p> <p><input checked="" type="checkbox"/> NA, not using trademarks at trade fairs</p>

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<p><b>Section 6.6 and 6.7 Investment/Financial Claims</b></p> <p><del>6.6 When investment companies or others are making financial claims based on the organization's FSC certified operations, the organization has taken full responsibility for the use of the FSC trademarks.</del></p> <p><del>6.7 Any such claims have been accompanied by the disclaimer, "FSC is not responsible for and does not endorse any financial claims on returns on investments."</del></p>	<p><input type="checkbox"/> C</p> <p><input type="checkbox"/> NC</p> <p><input type="checkbox"/> C w/ OBS/ c/ OBS</p> <p><input checked="" type="checkbox"/> NA, not making financial claims about FSC status</p>
<p><b>7.1 and 7.2 Other Forestry Certification Scheme Logos</b></p> <p><del>The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.</del></p>	<p><input type="checkbox"/> C</p> <p><input type="checkbox"/> NC</p> <p><input type="checkbox"/> C w/ OBS/ c/ OBS</p> <p><input checked="" type="checkbox"/> NA, not using other scheme logos</p>

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<p><del>7.3 Business Cards</del></p> <p><del>The FSC trademarks have not used on business cards to promote the organization's certification.</del></p> <p><del>The FSC logo or 'Forests For All Forever' marks are not used on business cards for promotion.</del></p> <p><del>A text reference to the organization's FSC certification, with license code, is allowed, for example "We are FSC® certified (FSC® C#####)" or "We sell FSC® certified products (FSC® C#####)".</del></p>	<p><input checked="" type="checkbox"/> <del>C</del></p> <p><input type="checkbox"/> <del>NC</del></p> <p><input type="checkbox"/> <del>C w/ OBS/ c/ OBS</del></p> <p><input type="checkbox"/> <del>NA, approval granted prior to July 1, 2011</del></p>
<p><del>7.4 Promotion with CB Logo</del></p> <p><del>FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.</del></p>	<p><input checked="" type="checkbox"/> <del>C</del></p> <p><input type="checkbox"/> <del>NC</del></p> <p><input type="checkbox"/> <del>C w/ OBS/ c/ OBS</del></p>
<p><del>Evidence 6.1 6.3, 6.5 6.7, 7.1 7.4: <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above;</del></p> <p><del><input type="checkbox"/> The following nonconformance(s) were detected _____; or</del></p> <p><del><input type="checkbox"/> Refer to OBS: _____</del></p>	

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### ~~Annex A: Trademark use management system~~

~~NA, not using a trademark management system (Annex A checklist may be deleted)~~

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### ~~Annex B: Additional trademark rules for group FM certificate holders~~

~~NA, not a group FM certificate or group does not use FSC trademarks (Annex B checklist may be deleted)~~

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~~N/A, does not use/intend to use FSC trademarks for any purposes (finished with this section); or~~

~~N/A, is fully integrated and all trademark uses are treated under the COC Annex to this report that includes a full review of FSC-STD-40-004 and FSC-STD-50-001.~~

### ~~Appendix 8 – Group Management Program~~

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~~This is not a group certificate, so this appendix is not applicable.~~

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