Sustainable Forestry Initiative[®] Forest Management Audit Report

Department of Agriculture, Conservation and Forestry -Bureau of Parks and Lands – Maine (Maine BPL)

Certificate # SCS-SFI/FM-008672

SFI 2022 Standards and Rules[®], Forest Management 2nd Surveillance Audit

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Client Website Bureau of Parks and Lands: Maine DACF			

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Public Summary Report

SFI® Forest Management Standard

SECTION A – PUBLIC SUMMARY

Foreword

Organization of the Report

This report of the results of your audit assessment is divided into two sections. Section A provides the public summary and background information that is required by the Sustainable Forestry Initiative[®] Section A is made available to the public and is intended to provide an overview of the audit process, the management programs and policies applied to the forest, and the results of the audit. Section A will be posted on the SFI website and Section B contains more detailed results and information for required SFI record-keeping or for use by the Certified Organization.

Principles of SFI Forest Management

The SFI 2022 Standards and Rules[®] for Forest Management promotes sustainable forestry and includes measures to *protect water quality, biodiversity, wildlife habitat, species at risk and Forests with Exceptional Conservation Value.*

The 13 SFI Principles for Forest Management are:

- 1. **Sustainable Forestry:** To practice sustainable forestry to meet the needs of the present while promoting the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, climate change mitigation, biological diversity, wildlife and aquatic habitats, recreation and aesthetics.
- 2. Forest Productivity and Health: To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive species and other damaging agents and thus maintain and improve long-term forest health and productivity.
- 3. **Protection of Water Resources:** To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality, to meet the needs of both human communities and ecological systems.
- 4. **Protection of Biological Diversity:** To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, ecologically important species and native forest cover types.

- 5. **Aesthetics and Recreation:** To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.
- 6. **Protection of Special Sites:** To manage lands that are ecologically important, geologically or culturally important in a manner that takes into account their unique qualities.
- 7. **Responsible Fiber Sourcing in North America:** To use and promote among other forest landowners sustainable forestry that is both scientifically credible and economically, environmentally and socially responsible.
- 8. **Legal Compliance:** To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.
- 9. **Research:** To support advances in sustainable forest management through forestry research, science and technology.
- 10. **Training and Education:** To improve the practice of sustainable forestry through training and education programs.
- 11. **Community Involvement and Social Responsibility:** To broaden the practice of sustainable forestry on all lands through community involvement, socially responsible practices, and through recognition and respect of Indigenous Peoples' rights and traditional forest-related knowledge.
- 12. **Transparency:** To broaden the understanding of forest certification to the Forest Management Standard by documenting certification audits and making the findings publicly available.
- 13. **Continual Improvement:** To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.

1. General Information

Organization Name	Department of Agriculture, Conservation and Forestry - Bureau of Parks and Lands – Maine (Maine BPL)
Contact Information (Name, Title, Phone, Email)	Michael Pounch 18 Elkins Lane, Augusta, ME 04333 207-215-7824 Michael.A.Pounch@maine.gov
Audit Dates	19-21 Sep 2023 (Tue-Thu)
SFI Certificate Type	 Single Multi-site. This Audit covered the requirements of the central organization and a subset of sites. These sites were selected based on proximity and length of time since previous audits. See Summary of Audit Itinerary for details of sampling.

1.1 Name, Contact, and Certificate Information

2. Summary Description of the Management Unit(s)

	SFI: List o	f all sites/FN	IUs under sco	ope of the certificate, including certified acres.		
Description of Ownership	□ ATFS: List of all sites/FMUs under scope of the certificate, including certified acres. If a Group certificate provide a description of the group structure					
Total Forest Area (Acres)	624361					
	□ Single sit	e descriptior of all sites/FN		ope of the certificate, including certified acres.		
	Zone	Acres	2023			
	Centra	l Office	Х			
	ZE1	52475				
	ZE2	37894				
	ZE3	55865				
	ZE4	47899				
	ZN1	49116				
Description of Sites and	ZN2	35592.1				
Group Membership under	ZN3	37676				
Scope	ZN4	35911				
	ZW1	71846	X (s)			
	ZW2	66191				
	ZW3	41236				
	ZW4	37974				
	ZW5	8981	X (s)			
	ZW6	45705				
		mmary of Sit Description of	-	der scope of certificate, including acres. ture.		

Management Unit Maps	See state website which provides publicly available maps.
	General description of major timber types with a general characterization of management approaches
	used (natural regeneration vs. planting, thinning regimes, even-aged vs. uneven-aged silvicultural).
Forest Types and Key Ecological Features	The forests managed by the Bureau of Parks and Lands are distributed throughout the state and reflect most of Maine's physiographic conditions and forest cover types. The acres under BPL's management are distributed primarily throughout the northern two-thirds of Maine, and most have been acquired since 1975 in trades with industrial and large private nonindustrial landowners. The state of Maine organizes these lands under Ecoregions described here, <u>Maine Natural Areas Program Ecoregions</u> , and then into Natural Communities and Ecosystems with approximately 104 natural communities and 24 ecosystems, <u>Natural Communities and Ecosystems</u> . The Maine Natural Areas Program (MNAP) has classified and distinguished 104 different natural community types that collectively cover the state's landscape. These include habitats such as floodplain forests, coastal bogs, alpine summits, and others. Each type is assigned a <u>rarity rank</u> of 1 (rare) through 5 (common) both within Maine (<u>state rank</u>) and globally (<u>global rank</u>). MNAP has focus on natural community types ranked S1, S2, or S3, and outstanding examples (e.g., large, old growth stands) of S4 and S5 types.
	Natural Landscapes of Maine describes the composition, rarity, and distribution of each of
	the 104 natural community types, as well as the methods used to classify them. It also
	describes the 24 broader ecosystem types within which these natural communities typically
	occur, and it provides cross-walks to other classification systems, including those used by
	the National Vegetation Classification System and Society of American Foresters.
	The management plan outlining forest management policies and objectives:
Forest Management Planning	The system of resource management for lands is comprised of three basic elements: (1) The development of resource management plans by Unit, Park, or Historic Site; (2) the implementation of actions and recommendations set forth within such plans, and; (3) the monitoring and evaluation of both the ongoing and completed work. Each step is important in ensuring that the programs developed to achieve resource management objectives are consistent with the character of the land base and its intended use. The State of Maine BPL uses a compendium of documents that generally follow geographic scale from state-wide strategic planning down to individual stand prescriptions. The BPL provides management planning polices, Integrated Resource Policy (IRP) (PDF 678KB), silviculture guides and forestry handbooks to implementation of plans. The forestry management planning process is detailed for public access through the following website, Management Plans: Planning and Acquisition Process: State Parks and Public Lands: Maine ACF. All BPL management plans may be found here, Bureau of Parks and Lands Management Plans.
Sustainable Harvest Level Assessment	Public Summary of how long-term harvest levels are determined, maintained, and monitored. Note: Details supporting this description are provided with evidence under Performance Measure 1.1, when evaluated. The Integrated Resource Plan (IRP) provides a public summary of sustainable harvest level assessments and management planning, <u>Microsoft Word - IRP 2000.doc (maine.gov)</u> The sustainable harvest is calculated separately on about 15 segments (sustainable harvest units, see Glossary of IRP) of the overall land base, with groupings made to combine nearby parcels with similar biophysical conditions and growth patterns. These groupings are done using the results of the inventory. The base calculations include only regulated forest acres, defined as those areas where timber is either the dominant use or where timber harvesting is a regular though secondary part of the management. These secondary areas may require modification of sustainable harvest calculations to reflect the dominant use. During unit planning, unregulated acres are generally identified, and a sustainable harvest calculated for them at a rate lower than used for the base calculations.

3. Audit Process

3.1 Applicable Standards and Audit Objectives
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Certificate Code	SFI: SCS-SFI/FM-008672			
	□ Stage 1, Preliminary Review Audit	□ Stage 2, Certification Audit		
	□ Re-Certification	COVID-19 Additional Surveillance		
Audit Type	\Box 1 st , \boxtimes 2 nd , \Box 3 rd or \Box 4 th Surveillance			
	□ Transfer	Expansion of Scope		
	□ Other (<i>describe</i>):			
	SFI: 2022 Forest Management. <i>Objectives 1-17</i> . Objectives 1, 3, 6, 7, 11, 13, 16, and 17			
	SFI: Rules for Use of SFI On-Product Labels and Off-Product Marks			
Applicable Standards	SFI: Audits of Multi-Sites			
Applicable Standards	ATFS: Forest Management, 2021. Standards 1-8			
	□ ATFS: AFF 2021 Standards for Independently Managed Groups. Sections 1-4			
	□ ATFS: ATFS 2021 Logo Use Guidelines			

	□ N/A, this is not a multi-standard nor a multi-CB audit. BPL is also certified to the FSC [®] Forest Management Standard which completed as a combined audit simultaneous with SFI.				
	⊠ Combined □ Joint		□ Integrated		
Multiple Standards	A combined audit is when a client is being audited against the requirements of two or more standards	A joint audit is when two or more auditing organizations cooperate to audit a single client.	An integrated audit is when a client has integrated the application of requirements of two or more management systems standards into a single management system and is being audited against more than one standard.		
SFI Substitute or Modified Indicators	None, D Yes, Substitute or Modified Indicators used and justification:				
Certificate Scope/ Statement	The scope of the certificate includes all forest management activities associated with the Organization's sustainable forest management system with defined forest lands located in [location] and including the harvest, transport, and sale or trade of forest products, and other forest management system activities for the Audit Objectives. The Organization has sufficient control over any contracting or outsourcing of forest management planning and activities to ensure conformance to applicable certification requirements.				
Description of Sampling Approach	Maine BPL is organized into 3 Regions: Eastern, Western (1/2), and Northern zones. The Western Lot, due to size and geographic spread, is split into 2 sublots for sampling. 2023 will sample one half of the Western Region. Below the region level, individual properties are scattered throughout the state, divided into units of varying size for management purposes. Units in similar areas are grouped together under management plans, or have their own plan for larger units. Overall management planning and growth and yield projections are done at the level of the entire ownership. Zones are further subdivided into Lots. The 2023 audit sampled Western Lots as presented in the itinerary.				
Deviations from the Audit		icant deviations from th			
Plan	□ ⊠ No □ Yes. If yes, provide a description and explanation.				

3.2 Audit Team

Auditor name:	Beth Jacqmain	Auditor role:	Lead Auditor		
Qualifications:	Beth is a qualified Forest Management/Chain of Custody Lead Auditor to SFI and audit				
	team leader for FSC. Beth is Principal and Owner of American Nature Solutions forest				
	certification and management consultancy. Beth has over 18 years' experience as a forest				
	management practitioner including private consulting, public land management, and				
	private corporate forest management working with landowners and harvest crews. She is				
	a member of the Forest Guild, Society of American Foresters, Society for Conservation				
	Biology, and Ecological Society of America. SAF Certified Forester #1467, MS Forest				
	Biology/Ecology, Auburn University, BS Michigan State University. Qualified ANSI RAB				
	accredited ISO 14001 EMS Lead, ISO 19011, and 17021 QMS.				
Auditor name:	Dan Simonds	Auditor role:	Team Auditor		
Qualifications:	A qualified lead auditor, for FSC, SFI, & PEFC Forest Management and Chain of Custody				
	systems with 18 years of experience in third party certification. A graduate of UMaine				
	College of Forestry and Maine-licensed Professional Forester (Maine #884) & Certified				
	Forester, with 40 years of practical experience in the region.				

3.3 Total Time Spent on Audit

A. Number of days spent on-site for the Audit	3
B. Number of auditors participating in on-site audit	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	1
E. Total number of person days used in audit	7

3.4 Summary of Audit Itinerary and Site Visits

Location(s) sampled	Dallas, Richardson, Mahoosics, Bald Mountain Areas within Western Sustainable Harvest
Location(s) sampled	Units.
Number of field sites	15
Summary of Cover Types	Mixed hardwood and Mixed conifer-hardwood sites with native tree species common to
visited	northern Maine.
Summary Description	Seven silvicultural and harvest sites were inspected over the two days. Also included inactive
/Number of Silviculture	(monitoring) of ecoreserves, wildlife openings, and one emergency helipad establishment.
Activities inspected	
Summary Description	Three harvest sites were inspected over the two days.
/Number of Harvest	
Areas inspected	
Summary Description of	Roads were inspected throughout. 6 specific road and culvert stops were included in notes
Road infrastructure	and infrastructure was examined throughout with no issues identified.
inspections	

3.5 Evaluation of Management Systems

SCS deploys teams with expertise in forestry and other relevant fields to assess the certified organization's conformance to SFI standards and policies. Audit methods include reviewing documents and records, interviewing 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 relevant stakeholder input. When there is more than one team member, each member may review parts of the standards based on their background and expertise. Applicable aspects of the Management System under evaluation, such as Management System Review and other relevant Objectives, Performance Measures, and Indicators will also inform the audit team. On the final day of an evaluation, team members convene to deliberate the findings of the audit jointly. This involves an analysis of all relevant field observations, interviews, reviewed documents and records, and relevant stakeholder input. 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.

3.6. Changes to Management System

- ☑ There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the SFI standards, rules, and policies.
- □ Significant changes that affect the management system occurred since the last audit described as follows (describe):

3.7 Confirmation of Meeting Audit Objectives

The objectives for this audit included:

- a. Determination of the conformity of the client's management system, or parts of it, with audit criteria (Selected Objectives, Performance Measures, and/or Indicators).
- b. Determination of the ability of the management system to ensure the client meets applicable statutory, regulatory and contractual requirements.
- c. Determination of the effectiveness of the management system to ensure the client can reasonably expect to achieve specified objectives.
- d. As applicable, identification of areas for potential improvement of the management system.

Audit Objectives were met	Yes \boxtimes No \square If no, provide an explanation:
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4. Results of Audit

4.1 Grading of Possible Findings

Once a consensus is reached by the audit team, determinations of grading are made as to the level of findings. Grading of findings may occur as follows:

- Major CARs: Major Corrective Action Requests (CARs) occur when one or more of the SFI 2022 Standard(s) performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of a Certified Organization's SFI system to meet an SFI objective, performance measure or indicator occurs.
- Minor CARs: An isolated lapse in SFI 2022 Standard(s) implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator.
- Opportunities for Improvement: Opportunities for Improvement (OFIs) are identified by audit team members where the client is in conformance, but there is a risk to conformance in the future. Nonconformance with the standard requirements cannot be recorded as OFIs.
- Exceeds: Practices that exceed the basic requirements of the SFI 2022 Standards and Rules for Forest Management or Fiber Sourcing.

4.2 Table of Audit Results and History of Findings for Certificate Period

This table lists Findings to the Performance Measure and/or Indicator level for each year of the certificate period and is updated annually.

SFI Objective	Cert/Re-cert Evaluation (2021) 2015-2019 Std	1 st Annual Evaluation (2022) 2015-2019 Std	2 nd Annual Evaluation (2023) <i>2022 Std</i>	3 rd Annual Evaluation (2023)	4 th Annual Evaluation (year)
	Minor 2.3.4	OFI 15.1.3	Minor 3.1.1		

No findings			
1			
2			
3		Minor 3.1.1	
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
COC			
Trademark			
Group			
Other			

4.3 General Description of Evidence of Conformity

This section summarizes the general evidence found to verify conformity that is detailed in Appendix 5.

SFI Objective	Summary of Evidence
Objective 1. Forest Management Planning. To ensure	The forest management plan and supporting
forest management plans include long-term	documentation and the associated inventory data
sustainable harvest levels and measures to avoid	and growth models were the key evidence of
forest conversion or afforestation of ecologically	conformance.
important areas.	
Objective 2. Forest Health and Productivity. To	Not evaluated during this audit
ensure long-term forest productivity and conservation	
of forest resources through prompt reforestation,	
afforestation, deploying integrated pest management	
strategies, minimized chemical use, soil conservation,	
and protecting forests from damaging agents.	
Objective 3. Protection and Maintenance of Water	Field observations of a range of sites were the key
Resources. To protect the water quality and water	evidence. Auditors visited portions of selected field
quantity of rivers, streams, lakes, wetlands, and other	sites that were close to water resources. BMPs are
water bodies.	an important part of the program to protect water
	resources.
Objective 4. Conservation of Biological Diversity	Not evaluated during this audit
To maintain or advance the conservation of biological	
diversity at the stand- and landscape- level and across	

a diversity of forest and vegetation cover types and	
successional stages including the conservation of	
forest plants and animals, aquatic species, threatened	
and endangered species, Forests with Exceptional	
Conservation Value, old-growth forests and	
ecologically important sites.	
Objective 5. Management of Visual Quality and	Not evaluated during this audit
Recreational Benefits. To manage the visual impact of	
forest operations and provide recreational	
opportunities for the public.	
Objective 6. Protection of Special Sites. To manage	Identification of special sites through periodic
lands that are geologically or culturally important in a	database searches and interviews with local experts
manner that takes into account their unique qualities.	and stakeholders, cataloging and documenting
	sites, development of written plans for protection
	and management, and training for protection and
	management were witnessed.
Objective 7. Efficient Use of Fiber Resources. To	Field reviews and interviews with staff
minimize waste and ensure the efficient use of fiber	demonstrated efficient use of resources.
resources.	
Objective 8. Recognize and Respect Indigenous	Not evaluated during this audit
Peoples' Rights. To recognize and respect Indigenous	
Peoples" rights and traditional knowledge.	
Objective 9: Climate Smart Forestry	Not evaluated during this audit
To ensure forest management activities address	
climate change adaptation and mitigation measures.	
Objective 10. Fire Resilience and Awareness	Not evaluated during this audit
To limit susceptibility of forests to undesirable	
impacts of wildfire and to raise community awareness	
of fire benefits, risks, and minimization measures.	
Objective 11. Legal and Regulatory Compliance	Field reviews of ongoing and completed operations
To comply with all applicable laws and regulations	were the most critical evidence. Regulatory
including, international, federal, provincial, state, and	compliance has been very strong.
local.	
Objective 12. Forestry Research, Science and	Not evaluated during this audit
Technology. To invest in research, science, and	
technology, upon which sustainable forest	
management decisions are based.	
Objective 13. Training and Education. To improve the	Review of BPL involvement with SIC, support of
implementation of sustainable forestry through	logger education and training programs
appropriate training and education programs.	
Objective 14 . Community Involvement and	Not evaluated during this audit
Landowner Outreach. To broaden the practice of	
sustainable forestry through public outreach,	
education, and involvement, and to support the	
efforts of SFI Implementation Committees.	
enons of 51 implementation committees.	

Objective 15. Public Land Management	Not evaluated during this audit
Responsibilities. To participate and implement	
sustainable forest management on public lands.	
Objective 16. Communications and Public Reporting	Review of SFI website confirms that all past public
To increase transparency and to annually report	summaries have been posted.
progress on conformance with the SFI Forest	
Management Standard.	
Objective 17. Management Review and Continual	Review of 2022 SFI Progress Report, review of past
Improvement: To promote continual improvement in	copies of annual internal progress review.
the practice of sustainable forestry by conducting a	
management review and monitoring performance.	

4.4 Existing Corrective Action Requests, OFIs, and Exceeds

Finding Number: OF	I 2022.1			
Finding and	□ Major: Pre-condition to certification			
Deadline	Major: 3 months from Closing Meeting			
	☐ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing			
	🛛 OFI: no deadline			
	Exceeds: no deadline			
	Other deadline (specify):			
SFI Indicator:	15.1.3 Annual review of progress by mana	agement and determination of changes		
	and improvements necessary to continua	Ily improve conformance to the SFI		
	2015-2019 Standard. (See also 17.1 of th	e 2022 SFI Forest Management		
	Standard).			
□ Non-Conformity	oxtimes Background/ Justification in the case			
	continuous improvement process meets the	-		
	ews of progress and determine changes and			
- ·	are in place for the state's program, it coul			
	o specific expectations for SFI multi-site ce	6		
	support the management review process. (See also 17.1 of the 2022 SFI Forest Management Standard.)			
Action Plan and	OFI's do not require an action plan or a root cause analysis be submitted.			
Root Cause				
Analysis (to be				
prepared by				
Organization)				
SCS Review of	Accepted	Rejected (<i>explain</i>):		
Action Plan	SCS representative:	Date:		
Evidence and	and			
Actions				
Implemented by				
Organization				
SCS Review of				
Implemented				
Actions				

Status of Finding:	
	Upgraded to Major
	Other decision (refer to description above)

4.5 New Corrective Action Requests, OFIs, and Exceeds

Finding Number: 20	23.1		
Finding and	□ Major: Pre-condition to certification		
Deadline	□ Major: 3 months from Closing Meeting		
	⊠ Minor: Next audit (surveillance or re-evaluation) or 12 months from closing		
	OFI: no deadline		
	Exceeds: no deadline		
	Other deadline (specify):		
SFI Indicator:	3.1.1. Program to implement federal, state, or provincial water quality best management		
	practices during all phases of management activities.		
⊠ Non-Conformity	\Box Background/ Justification in the case of OFI or Exceeds		
The organization's ir	nplementation of water quality BMP's may not be fully effective. Evidence from		
field observations in	cludes some recent harvests which lacked effective skid trail stabilization measures.		
Action Plan and	Root Cause Analysis:		
Root Cause	- BPL continuously experiences staff turnover, with 2-3 new foresters hired		
Analysis (to be	each year, which requires an ongoing training process for new and		
prepared by	veteran foresters alike.		
Organization)	 BPL is observing varying "levels of acceptability" when it comes to site 		
	impacts and when to apply BMP's (water bar, shut down operations,		
	-		
	•		
	 remediate ruts, etc). The adoption in 2020 of a BPL requirement to complete a peer-reviewed BMP plan for all harvest activity has bolstered BMP planning, however, the direct application is still up to individual foresters which leaves opportunity for inconsistency in BMP application. Timberland managers in Maine, including BPL, are currently experiencing extreme challenges due to increased frequency of high intensity precipitation events and unreliable winter freeze/thaw regimes. The 2023 Winter and Summer leading up to the BPL audit was by all accounts and records an entirely unprecedented year of rain and warm winter weather. While applied BMP's were highly effective in most cases even in the face of extreme weather, inconsistencies lead to observed problems including: Applied BMP's (water bars and seeding) that were observed to be grossly overwhelmed by erosion from early thaws (ruts) and 6 months of extreme rainfall leading to soil erosion. Omission of BMP's (lack of waterbar installation) on a long-standing skid trail that historically had been stable and continued to be stable when observed on the audit but by definition, should have been treated with water bars as a preventative measure. Action Plan: Document BMP training for all staff since 2020. Determine what basic and higher-level training is needed for forestry staff. 		

	 Develop guidance documents and standard operating procedures in order to develop uniform "level of acceptability". Determine most effective way of delivering these materials (stand-alone policies v. contractual inclusions v. incorporation in BPL's BMP plans). Implement BMP training plans as developed for each calendar year(s). 		
SCS Review of	Accepted		
Action Plan	SCS representative: Brendan Grady	Date: 3/28/24	
Evidence and			
Actions			
Implemented by			
Organization			
SCS Review of			
Implemented			
Actions			
Status of Finding:	 Closed Upgraded to Major Other decision (refer to description a 	hove	

5. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Sustainable Forestry Initiative standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the Certified Organization's response to any open CARs.	Yes 🛛 No 🗆
Comments:	

SCS Global Services Report

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