



**BUREAU
VERITAS**

**Bureau Veritas Certification
North America, Inc.
SFI Forest Management Audit Report**

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Company Name	Lone Rock Timber Management Co.
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PQC Code	E06
Contract Number	US2063595

Certification Audit:	X	Re-Certification Audit:		Surveillance Audit:		#	Scope extension audit:	
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Audit Summary
<p align="center">Introduction</p> <p>This report summarizes the results of the initial audit conducted on Lone Rock Timber Management Company’s SFI program for forest management operations. Richard Boitnott, Bureau Veritas Certification Lead Auditor, conducted the stage 1 audit on October 9, 2015, and stage 2 on November 17-19, 2015. Mr. Boitnott is a certified forester, an EMS lead auditor, and has wildlife management expertise.</p> <p align="center">Audit Scope, Objectives and Process</p> <p>The scope of the audit is “Land and Timber Management”. The audit was conducted against the SFI 2015-2019 Standard Forest Management Edition. All SFIS Objectives were reviewed during the audit. There was no substitution or modification of indicators. Specifically, two objectives of the SFI audit were to verify that the Program Participant’s SFI Program is in conformance with the SFI Objectives, Performance Measures, and Indicators, and any additional indicators that the Program Participant chooses, and verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground. Standard Bureau Veritas Certification protocols and forms were applied throughout the audit as provided by the most recent version of the Bureau Veritas Certification SFI Auditor Handbook available on the auditor access website.</p> <p align="center">Audit Plan</p> <p>The stage 1 audit was conducted for 1 day October 9. The stage 2 audit was conducted for 3 days November 17-19. A closing meeting was held at the end of the day on November 19. An audit plan was developed and maintained on file by Bureau Veritas Certification.</p> <p align="center">Company Information</p> <p>Lone Rock is a forest management company, managing approximately 128,000 acres in Oregon. The company manages land near Roseburg, Coos Bay, and Medford. The coastal properties consist primarily of Douglas fir, with lesser amounts of western hemlock, western red cedar, Sitka spruce, red alder, and noble fir. The coast range receives much more rainfall than the interior. Topography is generally steep, with a majority of sites logged using cable systems. Regeneration is accomplished through herbicide site preparation and planting. The primary species is Douglas fir, although a mix of other species typically occupies regenerated sites depending on the species mix of the previous</p>

stand. The property near Roseburg also consists primarily of Douglas fir, and is regenerated artificially following chemical site preparation. The Medford properties are drier, resulting in a greater prevalence of Ponderosa pine. Sugar pine, incense cedar, and white fir are also found in this region, as well as a number of hardwood species. Topography in this area is more gentle, with more ground skidding used than cable logging. Stands in the Medford area are also regenerated artificially using herbicide site preparation and planting, with Douglas fir and ponderosa pine being the primary species.

A forest practices act (FPAs) is in place in Oregon, which proscribes many activities that support the company’s SFI program. Riparian protection is heavily regulated and monitored by state agency stewardship foresters. Wildlife management practices are also regulated, with the amount of standing retention and downed woody debris also controlled by FPA.

Multi-Site Requirements

Lone Rock operates a multi-site program consisting of a central office in Roseburg, with offices in Myrtle Point and Central Point. The company’s management system is controlled and directed by an SFI manager located at the central office. The SFI manager operates an internal audit program across all offices. Resource units are responsible for developing corrective actions and reporting to the central office. The internal audit program is one upon which Bureau Veritas Certification can place a high degree of reliance to ensure continued conformance with the SFI standard. All sites are audited each year since the company only has two in addition to the central office. However, the company wants to grow, so multi-site sampling will be appropriate in the future.

Multi-Site	X	Group Certification	
Sites		Sites Audited During this Event	
Roseburg, OR		X	
Myrtle Point, OR		X	
Central Point, OR		X	

Audit Results

The stage 1 audit was conducted to determine if Lone Rock’s system documentation met the requirements of the SFI 2015-2019 Standard Forest Management Edition. The stage 2 audit was concentrated on field operations to determine if the company is meeting the requirements of the SFI Standard and its own system requirements in the way it conducts its forest management activities. The field audit consisted of a review of six clearcut harvests, four chemical applications, two roadside spray applications, and four road construction/re-construction projects. Two of the clearcut harvests had also been chemically site prepared.

Objective 1-Forest Management Planning:

Lone Rock has a stand-level forest inventory. Stands are grouped according to phototypes, which provides a land classification. The company uses FPS as its growth and yield model. Stands are grown for 65 years. Sustainable harvest levels are built every 10 years, with 3-year operational plan. Soils information is available in the GIS. Non-forest phototypes are removed from harvest scheduling. Biodiversity at landscape scales is accomplished through the company’s wildlife and biodiversity program. Actual harvest levels have been well below projected until the past 3 years,

when it has been in line with projected. Standing inventory has been increasing each year since 2002.

Lone Rock generally does not convert except for minor instances of converting alder back to conifer. The company has a program to analyze the ecological consequences of such conversions. Lone Rock does not convert anything to a non-forest use.

Objective 2-Forest Health and Productivity:

All stands are designated for artificial regeneration. Clearcut stands are regenerated as quickly as possible, certainly within two growing seasons. Evidence of this was apparent during the audit. Clearcut units were being chemically site prepared very quickly following harvest. Herbicide applications were very well done. Rates are well below label maximums. The company uses a variety of mixes depending on the vegetation present on each site. No overspray into off-target areas was observed during the audit.

Lone Rock uses Rozol to control mountain beavers. Rozol contains chlorophacinone which is listed as a WHO type 1 pesticide. However, the formulation used in Rozol uses an amount of chlorophacinone that classifies it as a WHO type U pesticide. Lone Rock was granted permission to use Rozol for mountain beaver control based on this formulation.

Soil productivity was well protected. Soils are mapped, and foresters and logging contractors had soil maps on site. The company has developed guidelines for the protection of soil productivity. All contract administrators and logging contractors were aware of the guidelines. The greatest threat to soil productivity is on ground-based logging systems. Very little rutting or soil compaction was observed during the audit.

Objective 3-Protection and Maintenance of Water Resources:

All harvest units observed during the audit met the Oregon FPA requirements for water quality protection. All riparian management areas (RMA) were well established, meeting or exceeding FPA requirements. BMP compliance is specified in the logging and road construction contracts. One road construction project had improper water bars installed that could lead to sediment deposit into a stream course. The BMP inspection form did not note this deficiency. The company received a minor non-conformance for the improper installation of water bars, and the lack of recognition of this deficiency on the BMP inspection form.

Objective 4-Conservation of Biological Diversity:

Lone Rock has developed a wildlife and biodiversity plan to ensure the incorporation of biodiversity considerations in the activity planning process. Procedures are in place to ensure the company meets the OR FPA requirements for wildlife tree retention and downed woody debris. All harvest units observed during the audit demonstrated ample green-tree retention and downed woody debris.

Age classes have been documented. All forest types are mixed conifer. A matrix has been developed describing the diversity of age class distribution. The company's land is adjacent to a considerable amount of public land (USFS and BLM). Therefore, Lone Rock's goal is to provide early seral stages of forest adjacent to public land's later seral stage.

The wildlife and biodiversity plan identifies the T&E species that could occur on Lone Rock property. The most significant species are the norther spotted owl (NSO) and marbeled murrelett (MAMU). Protection measures are in place where these species are found. No NSO nest sites are

located on Lone Rock property, but they are impacted by nest sites on adjoining public property. No MAMUs are known to occur on company land.

Information from the Oregon Biodiversity Information Center (OBIC) has been gathered on Lone Rock property. A wildlife consultant is responsible for reviewing future harvest units and comparing harvest sites with information cleaned from OBIC and the Oregon Conservation Strategy (OCS). Sites identified go beyond G1/G2, and include species of concern and habitats identified by OCS as being ecologically significant. Potential site locations are identified on harvest maps and management recommendations made. All harvest units are reviewed by a certified wildlife biologist for any OBIC occurrences, and protection measures are recommended and implemented. The company's effort to protect T&E species and FECVs was identified as a notable practice.

Employees are very well aware of the potential invasive species that could occur in their area of operation. One of the most significant is scotch broom, which is treated aggressively with herbicides.

Objective 5-Management of Visual Quality and Recreational Benefits:

Lone Rock has a program in place to address the visual quality of its operations. However, most harvest operations are well out of the site of the general public. The average clearcut size for 2014 was 57 acres. The Oregon FPA limits clearcuts to a maximum of 120 acres, so the company will never exceed that amount for its average. The Oregon FPA green-up requirement is used by Lone Rock as its green-up requirement. All clearcut harvest reviewed during the audit complied with the Oregon FPA requirement.

Objective 6-Protection of Special Sites:

Geologically or culturally unique sites have been identified. Geologically unique sites are included as a phototype. Lone Rock participates with two local native American tribes to identify culturally significant sites. Geologically significant sites are mapped in the GIS. No management activities are required. Culturally significant sites are not mapped, as that information is considered proprietary.

Objective 7-Efficient Use of Fiber Resources:

Utilization was acceptable on all harvest units observed during the audit.

Objective 8: Recognize and Respect Indigenous People's Rights:

Lone Rock has a written policy to respect the rights of indigenous peoples. There are two tribes with which Lone Rock works to identify potential occurrences of culturally significant sites on company property. The company shares their ownership shape files with the tribes, and meets with the tribes annually to review any properties where culturally significant sites could be impacted by Lone Rock operations. The company has an excellent relationship with the two tribes in its area. Lone Rock has a policy to respond the inquiries of indigenous peoples.

Objective 9-Legal and Regulatory Compliance:

Lone Rock has access to applicable laws and regulations, the most significant being the OR FPA. Pre-harvest planning process includes a review of potential T&E species. The company must provide a notification to ODF prior to harvesting. A pre-harvest conference is conducted with each job to review compliance. Interim and final inspections are conducted to ensure compliance. The company has received no violations from ODF.

Objective 10-Forestry Research, Science and Technology:

Lone Rock is a member of a number coops, contributing to a variety of research efforts, including forest health and productivity, water quality, and wildlife habitat. The company has access to information on the potential impacts of climate change on forest health and productivity, and wildlife and wildlife habitat. The company's access to information on wildlife and wildlife habitat satisfies a non-conformance issued during that state 1 audit.

Objective 11-Training and Education:

A written statement of commitment to the SFI 2015-2019 Standard is included in the sustainable forestry policy, and has been communicated throughout the company and to all contractors. Assignment of responsibilities for SFI is articulated in performance reviews. Staff training is conducted. Records are now being maintained, addressing a non-conformance issued during stage 1. Logging contractors are required to qualified according to the requirements of the Oregon Professional Loggers Association. Logging contracts contain a requirement for qualified loggers on each logging job.

Objective 12-Community Involvement and Landowner Outreach:

Lone Rock has just recently joined the Oregon SIC. Its participation in the OR SIC includes support for the development and distribution of landowner information materials that includes information on the conservation of biological diversity. The company is involved in a number or public educational opportunities, although it is not well documented. An opportunity for improvement was issued to encourage the company to better document its participation in public educational efforts. Lone Rock has a procedure in place to respond to public inquires.

Objective 13: Public Land Management Responsibilities: N/A

Objective 14-Communications and Public Reporting: Lone Rock just joined SFI, so the company has not submitted previous audit reports or an annual progress report. The company has procedures in place to ensure SFI audit reports are submitted to SFI, Inc., and to submit the annual progress report.

Objective 15-Management Review:

Lone Rock has a management review process in place. A number of management review meetings have taken place as the company developed its SFI program.

Findings

Previous non-conformances:

Three minor non-conformances were identified during the stage 1 audit. The SF02 nonconformity forms are included below. These were closed during stage 2.

Non-conformances:

One minor non-conformance was issued during stage 2 against objective 3. The SF02 is also included below.

Opportunities for Improvement:

One opportunity for improvement was issued. This should be considered in light of how it may affect conformance in the future.

1. PM 12.2, Ind. 1: Consider better documentation of educational efforts.

Notable Practices:

One notable practice was issued.

1. PM 4.2, Ind. 2: Lone Rock has developed an excellent system for locating and protecting occurrences of FECVs and other species of concern. A wildlife consultant is responsible for reviewing future harvest units and comparing harvest sites with information cleaned from the Oregon Biodiversity Information Center (OBIC), and the Oregon Conservation Strategy (OCS). Sites identified go beyond G1/G2, and include species of concern and habitats identified by the Oregon Conservation Strategy (OCS) as being ecologically significant. Potential site locations are identified on harvest maps and management recommendations made.

Logo/label use:

Lone Rock plans to use the SFI logo in the future, and knows to get approval from SFI, Inc. before doing so. The company does not plan to use the BVC logo.

SFI reporting:

Given this is an initial audit there have been no previous audit reports to submit to SFI, Inc.

Conclusions

Lone Rock Timber Management Company has developed and implemented an SFI program that meets the requirements of the SFI 2015-2019 Standard Forest Management Edition, with the exception of the one outstanding minor non-conformance. A corrective action plan has been developed, but evidence of implementation of corrective actions is use to dawn.kominick@us.bureauveritas.com within 90 days of the closing meeting.

SEE SF61s FOR AUDIT NOTES

Summary of Audit Findings:									
Audit Date(s):		From: Oct. 9, 2015 (stage 1) Nov. 17, 2015 (stage 2)				To: Oct. 9, 2015 (stage 1) Nov. 19, 2015 (stage 2)			
Number of SF02's Raised:			Major:			Minor:		4	
Is a follow up visit required:		Yes		No	X	Date(s) of follow up visit:			
Follow-up visit remarks:									
Team Leader Recommendation:									
Corrective Action Plan(s) Accepted		Yes	X	No		N/A		Date:	11/30/2015
Proceed to/Continue Certification		Yes		No	X	N/A		Date:	
All NCR's Closed		Yes		No	X	N/A		Date:	
Standard audit conducted against:									
1)	SFIS 2015-2019 FM Edition			3)					
2)				4)					
Team Leader (1):		Team Members (2,3,4...)							
Richard Boitnott; CF, EMS (LA)		2)							
		3)							
		4)							
		5)							
Scope of Supply: (scope statement must be verified and appear in the space below)									
Land and timber management									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	Late September, early October 2016								
Audit Report Distribution									
Lone Rock : Jake Gibbs-jgibbs@lrtc.com									
BVC: Dawn Komnick-dawn.komnick@us.bureauvertitas.com									

Clause	Audit Report
Opening Meeting	<p>Participants: Jake Gibbs, Ryan Bronson, Mark Dvorscak, Joe Newton, Mark Kincaid, Chris Sexton, Katie Nichols, Fran Cafferata, Tim Drake, Weston Addington, Bryan Nelson, Ken Hoffine</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Introductions ➤ Scope of the audit ➤ Audit schedule/plan ➤ Nonconformance types – Major / Minor ➤ Review of previous nonconformances – 3 (stage 1). ➤ Process approach to auditing and audit sampling ➤ Confidentiality agreement ➤ Termination of the audit ➤ Appeals process ➤ Closing meeting timing
Closing Meeting	<p>Participants: Jake Gibbs</p> <p>Discussions:</p> <ul style="list-style-type: none"> ➤ Introductions and appreciation for selecting Bureau Veritas Certification. ➤ Review of audit process - process approach and sampling. ➤ Review of OFIs and System Strengths ➤ Nonconformances - 4 ➤ Date for next audit. ➤ Reporting protocol and timing



SF02/NA NONCONFORMITY REPORT

Company Name and Site:		<u>SF02#:</u>	
Lone Rock Timber Management Co.		SFI-01	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US2063595	Stage 1	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
10/9/2015	SFIS PM 10.3, Ind. 2		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Jake Gibbs
REQUIREMENT OF AUDITED STANDARD:			
PM 10.3, Ind. 2 requires the organization to be knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional, or local programs.			
OBSERVED NONCONFORMITY AND, for FSC only, CORRECTIVE ACTION REQUEST:			
During the audit it was determined the company did not have access to information on the potential impacts of climate change on wildlife and wildlife habitat, and was not knowledgeable about such information.			
ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN (To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:	10/21/2015	Company Representative:	Jake Gibbs
Root Cause Analysis and Corrective Action			
<p>Root Cause: Information relating to climate change impacts on wildlife, wildlife habitats and conservation of biological diversity was not readily available to staff.</p> <p>Corrective Action Plan: Company will include information on international, national, regional or local programs focused on climate change impacts on wildlife, wildlife habitats and conservation of biological diversity on its internal digital library system. Annual wildlife, wildlife habitat and conservation of biodiversity training sessions will include segments on impacts of climate change.</p>			
ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)			
Root Cause: Acceptable			
Corrective Action Plan:			
Plan Accepted:	Yes	X	No
Auditor:		Richard Boitnott	Date: 10/22/2015
CORRECTIVE ACTION IMPLEMENTATION			
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days SFI, PEFC <input type="checkbox"/> ; 1 year FSC <input type="checkbox"/> ; other <input checked="" type="checkbox"/> X Days			
Corrective Action Completion Date:	11/19/2015	Company Representative:	Jake Gibbs
Corrective Action Implementation: Gathered information on the impacts of climate change on wildlife and wildlife habitat and made it available to anyone in the organization			
Method used to verify effectiveness of action taken: Review of information			
CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)			
Accepted:	Yes	X	No
Nonconformance Closed:		Yes	X
Follow Up Comments:			
Auditor:		Richard Boitnott	Date: 11/19/2015



SF02/NA NONCONFORMITY REPORT

Company Name and Site:		SF02#:	
Lone Rock Timber Management Co.		SFI-02	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US2063595	Stage 1	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
10/9/2015	SFIS PM 11.1, Ind. 3		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Jake Gibbs
REQUIREMENT OF AUDITED STANDARD:			
PM 11.1, Ind.3 requires the organization to have staff education and training sufficient to their roles and responsibilities			
OBSERVED NONCONFORMITY AND, for FSC only, CORRECTIVE ACTION REQUEST:			
While it appears training takes place, there are not records available to verify this.			
ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN (To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:	10/21/2015	Company Representative:	Jake Gibbs
Root Cause Analysis and Corrective Action			
<p style="background-color: yellow; margin: 0;">Root Cause:</p> <p style="background-color: yellow; margin: 0;">Corrective Action Plan:</p>			
Documentation of continuing education and training activities is not formalized. Staff will be responsible for tracking and recording all continuing education and training activities per calendar year. Supervisors will review during annual performance review.			
ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)			
Root Cause: Acceptable Corrective Action Plan: Acceptable			
Plan Accepted:	Yes	X	No
Auditor:	Richard Boitnott		Date: 10/22/2015
CORRECTIVE ACTION IMPLEMENTATION			
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days SFI, PEFC <input checked="" type="checkbox"/> ; 1 year FSC <input type="checkbox"/> ; other <input type="checkbox"/> X Days			
Corrective Action Completion Date:	11/19/2015	Company Representative:	Jake Gibbs
Corrective Action Implementation: Obtained records of training put on by contract wildlife biologist. Developed a system to electronically track all training in the future Method used to verify effectiveness of action taken: Review of training records			
CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)			
Accepted:	Yes	X	No
Nonconformance Closed:	Yes	X	No
Follow Up Comments:			
Auditor:	Richard Boitnott		Date: 11/19/2015



SF02/NA NONCONFORMITY REPORT

Company Name and Site:		<u>SF02#:</u>	
Lone Rock Timber Management Co.		SFI-03	
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:	
US2063595	Stage 1	Richard Boitnott	
Date:	Standard and Clause #:	Team Member:	
10/9/2015	SFIS PM 15.1, Ind. 2		
Major	Minor	Other Documents (if applicable):	Company Representative:
	X		Jake Gibbs
REQUIREMENT OF AUDITED STANDARD:			
PM 15.1, Ind.2 requires the organization to have a system for collecting, reviewing, and reporting information to management regarding progress in achieving SFI 2015-2014 Forest Management Standard objectives and performance measures.			
OBSERVED NONCONFORMITY AND, for FSC only, CORRECTIVE ACTION REQUEST:			
Lone Rock does not have a defined process in place to collect the data needed to be reviewed by management in order to evaluate the company's progress towards achieving SFI objectives			
ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN (To be completed by the Company. Plan to be submitted in 30 days)			
Corrective Action Plan Date:	10/21/2015	Company Representative:	Jake Gibbs
Root Cause Analysis and Corrective Action			
<p style="background-color: yellow; margin: 0;">Root Cause: Lack of defined process to collect data for management review to monitor company progress towards achieving SFI objectives.</p> <p style="background-color: yellow; margin: 0;">Corrective Action Plan: LRTM management team meets monthly. An SFI update is included on each agenda. At least twice per year, updates will include reports from the sustainability director on company adherence to SFI objectives. Noted deficiencies with corrective plans will be presented at these two meetings as needed.</p>			
ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)			
Root Cause: Acceptable Corrective Action Plan: Acceptable			
Plan Accepted:	Yes	X	No
Comments:			
Auditor:	Richard Boitnott		Date: 1/22/2015
CORRECTIVE ACTION IMPLEMENTATION			
To be completed by Company – Provide objective evidence. Not to exceed: 90 Days SFI, PEFC <input checked="" type="checkbox"/> ; 1 year FSC <input type="checkbox"/> ; other <input type="checkbox"/> X Days			
Corrective Action Completion Date:	11/19/2015	Company Representative:	Jake Gibbs
Corrective Action Implementation: Developed procedure for reviewing conformance to the SFI 2015-2019 Standard Method used to verify effectiveness of action taken: Review of procedure and of recent management review meeting minutes			
CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)			
Accepted:	Yes	X	No
Nonconformance Closed:		Yes	X
Follow Up Comments:			
Auditor:	Richard Boitnott		Date: 11/19/2015



SF02/NA NONCONFORMITY REPORT

Company Name and Site:		<u>SF02#:</u>
Lone Rock Timber Management Co.		SFI-04
Contract #:	Type of audit (e.g., initial, surveillance):	Team Leader:
US2063595	Stage 2	Richard Boitnott
Date:	Standard and Clause #:	Team Member:
11/19/2015	SFIS PM 3.2, Ind. 1; PM 3.1, Ind. 3	
Major	Minor	Other Documents (if applicable):
	X	
Company Representative:		
Jake Gibbs		

REQUIREMENT OF AUDITED STANDARD:

PM 3.2, Ind.1 requires the organization to have a program addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management, including the layout and construction of roads and skid trails to maintain water reach, flow and quality, and PM 3.1, Ind. 3 requires the organization to monitor BMP implementation.

OBSERVED NONCONFORMITY AND, for FSC only, CORRECTIVE ACTION REQUEST:

A road construction project observed during the audit had waterbars constructed in a way that could lead to sediment delivery into a stream course. This deficiency in waterbar installation was not noted on the road construction final inspection form.

ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION PLAN (To be completed by the Company. Plan to be submitted in 30 days)

Corrective Action Plan Date:	11/30/2015	Company Representative:	Jake Gibbs
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Root Cause Analysis and Corrective Action

Root Cause: The LRTM Road Construction BMP & Road Specifications document provides details on all aspects of road construction on LRTM managed lands. During the 2015 Site audit, a road construction project was found to have waterbars placed where sediment delivery to a stream or draw is possible. The LRTM Road Construction BMP & Road Specification document did not address outlet locations of cross drains or water bars in relation to draws or water courses. The Road Construction Final Inspection report did not note water bar outlet location possibly resulting in sediment delivery to a stream or draw due to existing policy being vague on this issue.

Corrective Action Plan: The site visited during the audit will be addressed to ensure delivery of sediment does not occur. At a minimum, straw bales will be placed where sediment delivery is possible.

The LRTM Road Construction BMP & Road Specification document will be updated to include guidance on outlet location for cross drains and water bars to prevent delivery of sediment to waters. The updated language will be reviewed with LRTM engineering and logging administrative staff. LRTM staff will review updated language with contractors immediately as well as include in pre-work discussions and during active construction in the next construction season.

ROOT CAUSE AND CORRECTIVE ACTION PLAN ACCEPTANCE REPORT

(To be completed by Bureau Veritas Certification – Verify effective identification of Root Cause and acceptance of Corrective Action Plan)

Root Cause: Acceptable

Corrective Action Plan: Acceptable

Plan Accepted:	Yes	X	No		Comments:	
Auditor:	Richard Boitnott				Date:	11/30/2015

CORRECTIVE ACTION IMPLEMENTATION

To be completed by Company – Provide objective evidence. Not to exceed: 90 Days SFI, PEFC ; 1 year FSC ; other X Days

Corrective Action Completion Date:		Company Representative:	
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Corrective Action Implementation:									
Method used to verify effectiveness of action taken:									
CORRECTIVE ACTION IMPLEMENTATION ACCEPTANCE REPORT (To be completed by Bureau Veritas Certification – Acceptance of Corrective Action taken)									
Accepted:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	Nonconformance Closed:	Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
Follow Up Comments:									
Auditor:					Date:				