



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

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Contract Number:	US 1432665	Certification Audit:		Re-Certification Audit:	X	Surveillance: (Indicate visit # or Pre-Assessment)	
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Audit Summary

Introduction

This report summarizes the results of a recertification audit conducted against SFI 2010-2014 Objectives conducted for Yakama Nation (YN) and Yakama Forest Products (YFP), headquartered in Toppenish. Jim Colla, Bureau Veritas Certification Lead Auditor, with assistance from Robert Carlson, Bureau Veritas Auditor; conducted the audit on September 16-17, 2013.

Audit Scope, Objectives and Process

Scope: Forest Land Management on 632,411 acres of Yakama Nation forest lands and Wood Procurement for Yakama Forest Products

The purpose of this recertification audit was to review documentation and sample field operations in order to assess conformance of Yakama Nation’s SFI program against selected applicable indicators of Objectives 1-20 of the 2010-2014 Standard. Specifically, two objectives of the SFI audit were to:

1. 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
2. Verify whether the Program Participant has effectively implemented its SFI Standard program requirements on the ground.

The opening meeting occurred on September 16, 2013 and took place at the Yakama Nation headquarters in Toppenish, WA. During the opening meeting the objectives for the extension audit were outlined and the audit process for collecting evidence and making audit findings was explained. Findings of non-conformance, opportunities for improvement, and appeals were also explained. The audit plan was discussed and agreed to, and the time and date of the closing meeting was also confirmed. There were no substitutions or edifications of SFI indicators. Standard Bureau Veritas Certification protocols and forms were applied throughout the audit as provided by the July 2013 version of the Bureau Veritas Certification SFI Auditor Handbook. Field notes and an SFI indicator checklist were completed. Steve Andringa, Yakama Nation Forestry Program Manager; and Doug Olney, YFP Resource Manager, were present throughout all portions of the audit.

Audit Plan

Monday, September 16, 2013

- 8:30 Jim Colla & Bob Carlson – Yakama Agency BIA Conference Room 225
 Opening Meeting: Introductions and Welcome
 Steve Andringa, Ryan Spencer, Tribal Forestry
 Mark Petruncio, BIA Forestry
 Invited Guests:
 Timber Committee, Agency Superintendent, BIA Forest Manager and
 Assistant, DNR Superintendent, YFP Rep
- 9:00 Desk Audit of Objectives – Jim Colla, BIA Conference Room 225
 1:30 Depart to YFP
 2:00 YFP Fiber Sourcing annual audit
 4:00 Reconvene at YFP (Jim/Bob and Agency staff)
 4:30 Adjourn

CONCURRENT SESSION

- 9:00 Desk Audit of Objective 1, Forest Management Planning – Bob Carlson, DNR Conference Room
 10:00 Depart to Field – Bob Carlson (Ryan Spencer to shuttle)
 11:00 Whiskey Jim Flat timber sale – Meet at Mill Creek G.S. (Joyce Ryan, TSO)
 Review of active sale and close-out procedures
 1:00 Dry Creek South timber sale – Meet at sale boundary on Dry Logy (Jonathan Tallman-Olney,
 TSO)
 3:00 Return to YFP
 4:00 Reconvene at YFP (Jim/Bob and Agency staff)
 Review of Day 1 and discuss Day 2
 4:30 Adjourn

Tuesday, September 17, 2013

- 8:00 Meet at Yakama Agency, DNR Conference Room
 8:30 Field Tour #1: Jim Colla, Mark Petruncio, and Ryan Spencer
 10:00 Haggerty Butte timber sale (active) (Joyce Ryan, Jonathan Tallman-Olney, Bryan Finley, and
 Wilbur Lomakema, TSOs)
 12:00 Depart to Klose Butte
 12:30 Klose Butte, Fee land timber sale (close-out/logging complete)
 Ryan Spencer, forester & Mike Hert, TSOs
 2:00 Return to Agency
 3:30 Auditors meet to discuss results – BIA Conference Room 225
 4:00 Close-out (see 4:00 agenda below)

CONCURRENT SESSION

- 8:30 Filed Tour #2: Bob Carlson, Steve Andringa, and Jack Rigglin
 10:00 Forest Development field review:
 10:00 Whiskey Jim: reforestation & subsoil project
 11:00 Dry Creek North: stand improvement
 12:00 East/West Hoppers: reforestation, stand improvement; subsoil project
 1:00 Oak Hill: reforestation, stand improvement, herbicide treatment
 2:00 Return to Agency
 3:30 Auditors meet to discuss results – BIA Conference Room 225
 4:00 Close-out: Jim Colla & Bob Carlson – Yakama Agency BIA Conference Room 225
 Discussion of results
 Steve Andringa, Ryan Spencer, Tribal Forestry
 Mark Petruncio, BIA Forestry; Doug Olney, YFP
 Invited Guests
 4:30 Adjourn

Organization Information

The Yakama Nation has been managing its forestlands in conjunction with the Bureau of Indian Affairs for decades. Its forest management program is guided by the 1855 treaty, many federal laws, and the 2005 Yakama Forest Management Plan. All planned harvest goes through an Environmental Assessment process and is subject to Tribal Council approval. Yakama Forest Products has been an enterprise business unit of the Yakama Nation since January 10, 1995. The mill provides a local facility for Yakama Nation logs to be processed and is a significant source of employment for Tribal members.

Audit Results

The audit consisted of document and record reviews and interviews. In addition 12 field sites, two of which were actively being harvested and the YFP mill were visited. Field activities inspected represented a broad spectrum of activities Yakama undertakes. Objectives 11-13 and 18 are not applicable.

Objective 1, Forest Management Planning: Yakama has a comprehensive forest management plan that meets and exceeds SFI requirements. YN strives to practice uneven age or multi-age management. The Annual Allowable Cut is calculated using CFI plots utilizing a BIA program and USFS FVS for growth modeling. The GIS system is complete and mature and includes fish & wildlife, water resources, soil, land classification, stand attributes, roads, cultural resources and numerous other attributes. Harvest does not exceed growth.

Objective 2, Forest Productivity: Most sites are designated for natural regeneration using shelterwood or seed tree systems. Limited plantings will occurring in small patch cuts, insufficiently stocked naturally regenerated sites; or larger openings caused by fires, wind, insects of disease. Each unit is formally surveyed for survival within two years, with follow up surveys on a regular basis. No exotic species observed on any sites visited in the field. Use of any chemicals is extremely limited; spray is done by hand application with the minimum amount of chemical necessary to accomplish control objectives. Spray work is conducted by contractors under the supervision of YN licensed foresters in accordance with applicable regulations. No overspray observed. YN is continually seeking to implement IPM strategies. Examples include planting alternate species in root rot problem areas. Multiple erosion control methods are used including timing of operations (use restrictions), location of roads and trails, rocking roads, cross-drainage, and filter strips. YN reuses existing roads, trails and landings in stable locations out of RMAs and minimizes new construction. Contractors are well versed in erosion control measures, no evidence of accelerated erosion observed. Excellent protection of residual trees noted throughout. YN strives to maintain healthy forest by active management; insect and diseases are at endemic levels.

Objective 3, Protection of Water Resources: Water resources and the fish and wildlife that depend on these resources are of concern culturally and economically to the Yakama. Regulatory elements are addressed in EAs. The Water Resources Plan and FMP meet or exceed federal and state standards; Yakama Nation is designated under EPA to develop WQS and BMPs to meet those standards on their lands. IDT approach is used on all sales and other treatments to ensure adequate and enhanced practices are designed into the project. Site specific details are included in applicable operating plans for each project. Foresters and contractors interviewed had excellent BMP knowledge. Sites are monitored at least weekly to ensure compliance. No evidence observed of any BMP infraction or excess sediment delivery to streams. YN or BIA staff field verify locations of all streams, non-forested wetlands, critical habitats and other areas of significance. Protection is done by identification in the map layer, flagging on the ground, and pre and post-harvest assessments.

Objective 4, Conservation of Biological Diversity: The wildlife staff is routinely validating, verifying and monitoring TES species. There have been native plant and animal surveys that have gone on for several years. YN species information is proprietary. While not formally designated, YN essentially views the entire ownership as a FECV, to be held and managed in trust forever for the benefit of Yakama people. Consultations with USFWS are conducted on all BIA timber sales, on fee lands YN does not formally consult. On tribal lands an internal prescription development process involving tribal representatives and wildlife biologists for species of concern are identified from state and federal lists. The result is incorporated into the TS prescriptions. The tribe continues to monitor owl sites and assess population trends. No record of ESA non-compliance.

Objective 5, Management of Visual Quality and Recreational Benefits: Cultural and aesthetic considerations

are considerations of all timber sales as part of NEPA- scoping process. Each sale goes through an on-site ID Team review. Cultural Resources, including aesthetics, is a consideration. Meadows are sacred, green up requirements are easily exceeded. The Yakama Nation Mt. Adams Recreation Area is the only portion of the Yakama Forest that is open to the public for recreation by permit. As a condition of the 1855 treaty, the remainder of the YN is open for YN members

Objective 6, Protection of Special Sites: The YN has a proprietary atlas of cultural and archeological sites that guides protection of these areas. A tribal archeologist is on staff and reviews all TS activities. There is a separate cultural resource staff that works off the YN with non-tribal interests. Cultural locations are restricted. Timber sales cannot proceed unless an arch survey has been completed and approved. One special site was visited; it is being protected, no future activity will occur.

Objective 7, Efficient Use of Forest Resources: Utilization standards are stated in the contract; YFP purchases all the sales, and will further market as practical. Depending on market conditions, YN has marketed biomass in the past and slash piles have been chipped and removed. At present there is no market for forest residuals or pulp, though YN will continue to seek market opportunities. TSOs inspect for utilization and document on inspection reports.

Objective 8, Landowner Outreach: See notable practices.

Objective 9, Use of qualified resource and qualified logging professionals: YFP continues to maintain, support and implement a program to promote trained professionals. YN only uses trained logging professionals on their own lands and they strongly encourage use of the same on gate wood. Procurement objectives address logger training goals and objectives. The contractors interviewed are WCLA certified.

Objective 10, Adherence to Best Management Practices: YFP Procurement and BMP Monitoring Procedures and harvest contracts contain requirements for compliance with BMP/SMZ practices. YFP works very closely with YN, constantly monitoring YN inspections and reports. Any active deficiencies are quickly addressed and corrective action implemented. YFP also has an inspection program to monitor gate wood purchases, which has amounted to less than 50MBF since the last audit. In addition, YN also regularly monitors for water quality, fish and wildlife and cultural resources.

Objective 14, Legal Compliance: A myriad of federal and YN laws are applicable; these include the National Indian Forest Resources Management Act; NEPA; ESA; and National Historic and Archeological Protection Act. YN utilizes site visits and a rigorous inspection program to ensure compliance. These visits and checklists note compliance with laws and regulations. Applicability of overriding social laws depends on whether the employee is a BIA, YN or YFP employee. Health and safety requirements, advisories and notes are posted at all offices and strategic locations.

Objective 15, Forestry Research: YN is extremely active in a number of research ventures. This may involve collecting data, baseline direct funding, direct technical support covering research related to fish, wildlife and forest management. Yakama and the WA SFI implementation committee will continue to explore ways they can work together to advance the cause of sustainable forestry. As the research and data on the Yakama Forest can be proprietary and lands are closed to non-tribal members, the Yakama Nation brings a different perspective to the WA SFI table.

Objective 16, Training and Education: YN and YFP staffs have been trained and remain competent. All interviewed were knowledgeable with respect to their roles and understanding of the SFI program. YFP continues to maintain, support and implement a program to promote trained professionals. YN only uses trained logging professionals on their own lands and they strongly encourage use of the same on gate wood

Objective 17, Community Involvement: See notable practices.

Objective 19, Communications and Public reporting: The 2012 YN Audit Report is posted on the SFI Website. All records necessary for reporting to SFI are maintained electronically and were reviewed as part of this audit.

Objective 20, Management Review and Continuous Improvement: The last formal review was completed in 2012. In preparation for the recertification audit, a comprehensive program review was completed to review YN readiness to be audited. The formal management review for 2013 will occur post this external audit in order to incorporate any findings into that review. Internal and external audits and reviews are presented to Tribal Council.

Findings

Previous non-conformances: Through the life of the expiring certificate, no non-conformances were issued. Seven opportunities for improvement were identified; sufficient action was taken by YN and YFP to sufficiently address the improvements.

Non-conformances issued: None issued.

Opportunities for Improvements: None issued.

Notable Practices: NP's are practices and actions that are exemplary and indicate a strong commitment to meeting the SFI intent and to continual improvement of their program. Two notable practices were identified during the audit:

- *PM 8.1, Indicator 1- Program Participants shall supply regionally appropriate information or services (e.g. information packets, websites, newsletters, workshops, tours, etc.) to forest landowners, describing the importance and providing implementation guidance.* YFP sources about 99% of their material from the Yakama Nation; the remainder comes from private landowners in the area. YFP and YN coordinate sourcing activities on a daily basis. YFP has developed a landowner packet based off the WDNR forest practices program to distribute to private landowners that covers all required elements. YFP and YN supports a myriad of Yakama Nation cultural and educational programs, in addition they support and contribute funding to the Washington Farm Forestry Association, Family Forest Foundation, Tree Farm and participate in the WSU family forest field day. Given only 1% of the wood supply comes from non-YN lands, the organization should be commended for their extensive support, in time and financially, to various landowner groups.
- *PM17.2 - Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to sustainable forest management.* YFP and YN support a myriad of Yakama Nation cultural and educational programs. Use of native flora/fauna for food, medicinal and ceremonial is of the highest importance, ongoing efforts are underway to research and capture institutional knowledge of elders so it can be passed on to future generations. Yakama offers scholarships and mentoring opportunities to pursue natural resource based education, some of which is pursued through Heritage University. Several former graduates are now employed by Yakama. Yakama runs youth camps focused on natural and cultural resources and are constantly donating wood products to the community and supporting conservation education.

Logo/label use:

Yakama Forest Products has secured approval from SFI, Inc. to use the on-product trademark on lumber wrap. There has been no off-product trademark use and none is anticipated.

SFI reporting:

During this audit verification of the SFI website was completed to ensure that the previous surveillance 2 audit report was submitted and posted.

Conclusions

The closing meeting was held at the Toppenish, WA office on October 17, 2013. The findings of notable practices were reviewed, and the confidentiality of audit results assured. There were no non-conformances issued during the audit. The closing meeting attendees were advised that the results of the audit conclude that the SFI program of the Yakama Nation and Yakama Forest Products is suitable and effective. These findings were not challenged. Recertification is recommended.

Surveillance Audit Schedule

The next surveillance audits should be scheduled for October in 2014 and 2015.

SEE SF61 FOR AUDIT NOTES

Summary of Audit Findings:						
Audit Date(s):	From: October 16, 2013			To: October 17, 2013		
Number of SF02's Raised:	Major:		0	Minor:		0
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	N/A	No	N/A	Date:	N/A
Proceed to/Continue Certification	Yes	X	No		Date:	October 17, 2013
All NCR's Cleared	Yes	N/A	No	N/A	Date:	N/A
Standard audit conducted against:						
1)	SFIS 2010-2014	3)				
2)		4)				
Team Leader (1):	Team Members (2,3,4...) N/A					
Jim Colla, RABQSA lead auditor	2) Robert Carlson					
	3)					
Scope of Supply: (scope statement must be verified and appear in the space below)						
Forest land management and wood procurement						
Accreditation's	ANAB					
Number of Certificates	1					
Proposed Date for Next Audit Event						
Date	October 1, 2014					
Audit Report Distribution						
Client: Steve Andringa; steve@yakama.com						
BVC – Cornelia Holmes; cornelia.holmes@us.bureauveritas.com						

Clause	Audit Report
Opening Meeting	<p>Participants: Steve Andringa – Forest Manager; Mark Petruncio- Administrative Forester; Doug Olney – YFP Resource Manager; and other BIA, YN and YFP designated staff; Jim Colla - lead auditor, Bob Carlson - auditor</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 nonconformance’s - NA ➤ Process approach to auditing and audit sampling ➤ Confidentiality agreement ➤ Termination of the audit ➤ Appeals process ➤ Closing meeting timing
Closing Meeting	<p>Participants: Steve Andringa – Forest Manager; Mark Petruncio- Administrative Forester; Doug Olney – YFP Resource Manager; and other BIA, YN and YFP designated staff; Jim Colla - lead auditor, Bob Carlson - auditor</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 ➤ Nonconformance’s - 0 ➤ Date for next audit. ➤ Reporting protocol and timing