



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

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PQC Code	E01E
Contract Number	US1432665

Certification Audit:		Re-Certification Audit:		Surveillance Audit:	#2	Scope extension audit:	
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**Audit Summary**

**Introduction**

This report summarizes the results of a surveillance audit conducted on Yakama Nation (YN); Sustainable Forestry Initiative (SFI) Forest Management program. The audit was conducted concurrently with the Yakama Forest Products (YFP) surveillance audit. Jim Colla, Bureau Veritas Certification Lead Auditor, conducted the audit from August 19-21, 2015.

**Audit Scope, Objectives and Process**

The scope of the audit is “Forest Land Management”. The goal is continued certification to the SFI 2015-2019 Certified Sourcing Standard. 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.

The opening meeting occurred on August 19, 2015 and took place at the Yakama Nation headquarters in Toppenish, WA. During the opening meeting the objectives for the surveillance 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. Confidentiality was assured. 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 current 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; along with several other staff members, were present throughout portions of the audit.

**Audit Plan**

Yakama Forest Products is headquartered in White Swan, WA. The Yakama Nation is headquartered in Toppenish, WA. The audit was conducted over a total of 2.5 days from August 19-21, 2015. Yakama Nation forest lands and the Yakama Forest Products facility were inspected during the audit. A detailed daily audit plan is on file with Bureau Veritas Certification.

**Company 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. At present there are 632,411 acres within the scope of the certificate. 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 a number of field sites, one of which was actively being harvested, were visited that represent the spectrum of forest management activities Yakama Nation.

**Objective 1-Forest Management Planning:** Yakama Nation has a comprehensive forest management plan that meets and exceeds SFI requirements. Large fires notwithstanding; 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 in recent years has been well below the calculated annual growth of 78MMBF. No conversion takes place; the forest land will never be sold or converted to non-forest use. It is to be maintained in perpetuity for the benefit of the Yakama people.

**Objective 2- Forest Health and Productivity:** All units are designated for either artificial or natural (vast majority) reforestation at the stand level in accordance with the guidelines. The vast majority of observed partial cuts contain well advanced regeneration. Yakama utilizes clear-cutting on a very limited basis and generally limits clearcuts to 20 acres in size. With the exception of salvage operations; e.g. Marker 28 Fire, supplemental reforestation efforts are primarily interplant in nature and only native species are planted. Significant reforestation efforts continue for the Marker 28 Fire. Use of any chemicals continues to be extremely limited; spray is done by hand application with the minimum amount of chemical necessary to accomplish control objectives. No silvicultural chemical use in the last year. Multiple erosion control methods have been utilized including timing of operations (use restrictions), reuse of existing roads and trails, rocking roads, and cross-drainage, and filter strips. The road system is in place and mature, extensive rocking has occurred; the entire system is gated; most is closed to non-Tribal people. No new road construction observed on any sites, reuse of existing trails and landings are required. Contractors are well versed in erosion control measures. YN has a dedicated fire staff and tactical resources; they are full cooperators with other federal, state and local fire agencies. At the time of the audit a large fire, Cougar Creek, was in progress

YFP Procurement and BMP Monitoring Procedures and Log Purchase Agreements contain requirements for compliance with BMP/SMZ practices. YFP works very closely with YN, constantly monitoring YN inspections and reports. YFP also has an inspection program to monitor gate wood purchases, which has amounted to less than 50MBF since the last audit. YFP will also monitor WDNR inspections on gate wood. All YN operations are visited frequently. YFP resource managers and YP foresters are in contact at least weekly during active operations. YN technical staff provides review on any WFPA application within the traditional Yakama homelands on issues related to cultural sites, fish and wildlife.

**Objective 3- Protection and Maintenance 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. IDT approach was used on areas considered for fire salvage. Site specific details have been included in salvage operating plans. Foresters and contractors interviewed had excellent BMP knowledge. Sites are monitored at least weekly to ensure compliance. No evidence observed of any BMP infraction, some excess sediment movement in hardest hit burn areas as a result of runoff. 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.

A notable practice is issued for the Klickitat River fisheries enhancement project; a multi-year and multi-phase project designed to improve habitat and fish numbers; the project covers several miles of the river. Restoration activities are aimed at restoring stream processes by removing or mitigating watershed

perturbances and improving habitat conditions and water quality. Actions to date include in-stream large woody debris placement, culvert replacements and other passage improvements, forest road rehabilitation, floodplain reconnection. Assessment, monitoring and data management are also crucial components of the project.

**Objective 4- Conservation of Biological Diversity:** A stated goal of the FMP is to “Maintain viable populations of native and desired non-native species of wildlife and their supporting habitats, while providing wildlife in sufficient numbers to meet the cultural and subsistence needs of Yakama Nation members”. The FMP has a goal of maintaining a minimum of 15% old growth habitat in each sub-basin. There is a designated primitive area is almost 35,000 ac. 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. Section 7 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 YN continues to monitor owl sites and assess population trends. Fire is being used as a fuel reduction tool (broadcast and pile burning); fire also helps to control unwanted species and encourages wanted species. The Cougar Creek fire will be closely monitored as it works its way into the primitive area.

**Objective 5- Management of Visual Quality and Recreational Benefits:** A stated goal of the FMP is to “Maintain the high-quality visual characteristics of the landscape, particularly in the Alpine, Primitive, Traditional Use areas.” The TS monitoring includes assessment of aesthetics and impact on cultural resources. Maximum clear-cut size is 20 acres; YN employs mostly un-even management; group selection cuts are generally limited to 5 ac. Exceptions to these limitations are for catastrophic reasons; e.g. Mile Marker 28 fire. Due to these constraints SFI green-up requirements are easily met. All field sites reviewed verified conformance to Objective 5 metrics as well as through observation while traveling between sites.

**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 and highly confidential. Timber sales cannot proceed unless an archeological survey has been completed and approved. Follow up compliance monitoring occurs. Several special sites were visited; all are being protected.

**Objective 7- Efficient Use of Fiber 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. OFI issued in 2014 regarding slash pile treatment has been addressed, by burning them. YFP is seeking ways to most efficiently address responsibility under the contract to treat slash.

**Objective 8- Recognize and Respect Indigenous People’s Rights:** The entire ownership is held in trust for members of the Yakama Nation, as recognized in the 1855 treaty. The Yakama Nation membership can provide input through a number of mechanisms; through IDT process, Tribal Council, and direct contact with individual tribal employees. Established processes and procedures are in place that apply to many Yakama programs. Many records are confidential in nature and cannot be shared with non-Tribal members. Cultural norms within the Yakama Nation means members have a vested interest and lifelong commitment to the land.

**Objective 9-Legal and Regulatory 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. Handbooks and manuals are readily available to staff hardcopy and on-line. There is mandatory annual on-line training. There is also a tribal environmental coordinator who is responsible for monitoring and reporting changes in laws. YFP Procurement and BMP Monitoring Procedures and Log Purchase Agreements contain requirements for compliance with BMP/SMZ practices. YFP works very closely with YN, constantly monitoring YN inspections and reports. All YN operations are visited frequently. YFP resource managers and YP foresters are in contact at least weekly during active operations.

YN technical staff provides review on any WFPA application within the traditional Yakama homelands on issues related to cultural sites, fish and wildlife.

Objective 10-Forestry Research, Science and Technology: Not audited

Objective 11-Training and Education: YN and YFP has communicated its commitment to employees and Tribal members through a newsletter and posted file letter. The documents have been updated to reflect the 2015-2019 Standard. YFP Staff that are responsible for the fiber sourcing program have been trained and keep up on SFI topics. YFP requires all their direct contract loggers to be WCLA trained and attend SFI Logger training and will only use qualified loggers on purchase (YN) contracts. This is a stated condition on the logging contract. Continuing education is built into to WCLA program. Yakama and the WA SFI implementation committee 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. Both Doug Olney (YFP) and Mark Petruncio (YN) are active members of the SIC.

Objective 12-Community Involvement and Landowner Outreach: Not Audited

Objective 13: Public Land Management Responsibilities: Not applicable

Objective 14-Communications and Public Reporting: The 2014 Yakama Nation and Yakama Forest Products 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 15-Management Review: The formal internal audit and management review occur post external audits in order to incorporate any findings into that review. Internal and external audits and reviews are presented to Tribal Council. In addition to tracking SFI progress, YFP local impact on employment is tracked. The SFI program can be considered mature. Following release of the 2015-2019 SFI standard and implementation guidance; YN and YFP opted to be audited to the revised 2015:2019 standard this surveillance audit.

## Findings

**Previous non-conformances:** None issued last audit

**Non-conformances:** None issued

**Opportunities for Improvement:** None issued

**Notable Practices:** PM3.1 (1), see above Objective 3 comments.

### Logo/label use:

Yakama Nation does not use, or plan to use, the SFI or BVC logos.

### SFI reporting:

The 2014 audit report for Yakama Nation and Yakama Forest Products is on the SFI website as required. YN and YFP have submitted 2014 annual report data to SFI as requested.

## Conclusions

The closing meeting was held at the YFP White Swan, WA office on August 21, 2015. The findings related to all audited indicators were reviewed, and the confidentiality of audit results assured. In the opinion of the auditor, Yakama Nation continues to implement an effective SFI program that meets the requirements of the

SFI 2015-2019 Forest Management Standard. Continued certification is recommended.

**SEE SF61 FOR AUDIT NOTES**

Summary of Audit Findings:									
Audit Date(s):		From: August 19, 2015				To: August 21, 2015			
Number of SF02's Raised:			Major:		0		Minor:		0
Is a follow up visit required:			Yes	No	Date(s) of follow up visit:				
Follow-up visit remarks:									
Team Leader Recommendation:									
Corrective Action Plan(s) Accepted		Yes	No	N/A	X	Date:			
Proceed to/Continue Certification		Yes	X	No	N/A	Date:		Aug 21, 2015	
All NCR's Closed		Yes	No	N/A	X	Date:			
Standard audit conducted against:									
1)	SFI 2015-2019 Forest Management			3)					
2)				4)					
Team Leader (1):			Team Members (2,3,4...)						
Jim Colla			2)						
Scope of Supply: (scope statement must be verified and appear in the space below)									
Forest Land Management									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	early September 2016								
Audit Report Distribution									
Client: Steve Andringa; <a href="mailto:steve@yakama.com">steve@yakama.com</a> – Doug Olney; <a href="mailto:doug@yakama-forest.com">doug@yakama-forest.com</a>									
BVNA: CAC – Dawn Komnick, <a href="mailto:dawn.komnick@us.bureauveritas.com">dawn.komnick@us.bureauveritas.com</a>									

Clause	Audit Report
Opening Meeting	<p>Participants: Steve Andringa – Forest Manager; Doug Olney – YFP Resource Manager; and</p> <p>Discussions: other BIA, YN and YFP designated staff; Jim Colla - lead auditor</p> <ul style="list-style-type: none"> <li>➢ Introductions</li> <li>➢ Scope of the audit</li> <li>➢ Audit schedule/plan</li> <li>➢ Nonconformance types – Major / Minor</li> <li>➢ Review of previous nonconformances - 0</li> <li>➢ Process approach to auditing and audit sampling</li> <li>➢ Confidentiality agreement</li> <li>➢ Termination of the audit</li> <li>➢ Appeals process</li> <li>➢ Closing meeting timing</li> </ul>
Closing Meeting	<p>Participants: Steve Andringa – Forest Manager; Doug Olney – YFP Resource Manager; and</p> <p>Discussions: other BIA, YN and YFP designated staff; Jim Colla - lead auditor</p> <ul style="list-style-type: none"> <li>➢ Introductions and appreciation for selecting Bureau Veritas Certification.</li> <li>➢ Review of audit process - process approach and sampling.</li> <li>➢ Review of OFIs and System Strengths</li> <li>➢ Nonconformance's - 0</li> <li>➢ Date for next audit.</li> <li>➢ Reporting protocol and timing</li> </ul>