08 AUGUST 2013

Source documents:
1 - Bureau Veritas audit report, 06 January 2012
2 - Bureau Veritas audit report, December 2011
3 - NSF-ISR public surveillance audit report, September 2010
4 - Email from Tom Charles to Donald Mansius, 08 August 2013

Maine Criterion 1: Soil productivity

Goal: Maintain site productivity.
Outcome: Site productivity will be maintained or improved, and the area in roads and yards will be minimized.

SFI Audit results:

Conformance to Objective 2 (Forest Productivity)

Performance Measure 2.3. Program Participants shall implement forest management practices to protect and maintain forest and soil productivity.

Finding:
1. All field sites visited exhibited excellent implementation of sound forestry practices, BMPs and minimal impact to soil productivity. (1, p. 5)
2. All sites visited were BMP compliant with regards to soil and water quality; … (2, p. 5)
3. Field observations and records associated with each timber harvest were used to confirm practices. MEBPL has certain programs in these areas, for protection against insects, diseases, and for careful management of activities which could potentially impact soil and long-term productivity. (3, p.3)

Assessment of this criterion: The SFI audit demonstrates that DPPL has attained the identified goal and outcome for this criterion.
Criterion 2: Water quality, wetlands and riparian zones

Goal: Maintain or improve the chemical, physical, and biological integrity of aquatic systems in forested areas and riparian forests.

Outcome: Forest management in shoreland areas protects water quality and aquatic and riparian forest biodiversity.

SFI Audit results:

Conformance to Objective 3 (Protection and Maintenance of Water Resources)

Performance Measure 3.1. Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws, and meet or exceed best management practices developed under Canadian or U.S. Environmental Protection Agency-approved water quality programs.

Finding:

1. All field sites visited exhibited excellent implementation of sound forestry practices, BMPs and minimal impact to soil productivity. (1, p. 5)

2. All sites visited were BMP compliant with regards to soil and water quality, stand residual, access and water crossings. (2, p. 5)

3. The bureau has demonstrated a history of compliance with the Maine FPA and state BMPs. Results of the field audit verified the bureau’s application of BMPs. (2, p. 5)

Performance Measure 3.2. Program Participants shall have or develop, implement and document riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system and other applicable factors.

Finding:

1. Stream and lake buffers were well established. (2, p. 5)

2. Field observations of a range of sites were the key evidence. Auditors visited the portions of many field sites that were closest to water resources, based on a field sample that was oriented heavily toward such sites. (3, p. 3)

Assessment of this criterion: The SFI audit demonstrates that DPPL has attained the identified goal and outcome for this criterion.
**Criterion 3: Timber supply and quality**

**Goal:** Improve the quantity and quality of future timber supply when appropriate.

**Outcome:** The management strategy and harvest levels for the lands will increase the quality and quantity of the forest resource as appropriate in the medium and long term (20 - 50 years).

**SFI Audit results:**

Conformance to Objective 1 (Forest Management Planning)

Performance Measure 1.1. Program Participants shall ensure that forest management plans include long-term harvest levels that are sustainable and consistent with appropriate growth-and-yield models.

**Finding:**

1. Evidence produced showed the five year average harvest volume to be approximately 75% of the five year average net growth, which equates to approximately 99% of the sustainable harvest level (five year average). The sustainable harvest level was reached in part through over-harvesting in the overmature tolerant hardwood stand types in an attempt to liquidate diseased, unhealthy timber volume before it reached an unmerchantable condition. (1, p. 3)

Conformance to Objective 2 (Forest Productivity)

Performance Measure 2.1. Program Participants shall promptly reforest after final harvest.

**Findings:**

1. [BPL] has not completed artificial regeneration activities on any parcels and relies on natural regeneration for all harvests, where stand regeneration is the planned objective. (1, p. 3)

2. During its most recent certification audit, BPL received a Major Nonconformance: [BPL] has not developed criteria for adequate regeneration stocking levels/species composition and does not have a process in place to determine if those criteria have been met. This issue was addressed as a minor CAR during last year [sic] renewal audit and no corrective action implementation has occurred. This minor CAR has been re-issued as a major CAR. (1, p. 10). Although this major CAR has not been closed, BPL staff report that their regeneration surveys have consistently found desirable regeneration in good growing position. This information has been reported to the auditor (email from Tom Charles to Donald Mansius, 08 August 2013).

**Assessment of this criterion:** The SFI audit and follow-up information supplied demonstrate that DPPL has attained the identified goal and outcome for this criterion.
Criterion 4: Aesthetic impacts of timber harvesting

Goal: Minimize adverse visual impacts of timber harvesting.

Outcomes:
1. The landowner will minimize visual impacts of harvests, roads, landings and other management activities.
2. The landowner’s planning staff are trained in and apply principles of visual quality management.
3. The landowner identifies areas with high and moderate visual sensitivity, and takes appropriate measures to avoid significant visual impacts whenever necessary.

SFI Audit results:
Conformance to Objective 5 (Management of Visual Quality and Recreational Benefits)

Performance Measure 5.1. Program Participants shall manage the impact of harvesting on visual quality.

Performance Measure 5.2. Program Participants shall manage the size, shape and placement of clearcut harvests.

Performance Measure 5.3. Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.

Findings:
1. Finding: Calculation of clearcut sizes was found to be a non-issue due to the small occurrence of clearcut harvests without established regeneration present. (1, p. 3)

2. The organization has maintained an excellent aesthetic program, developing buffers along all public traffic areas, angled skid trails, curved road entrances and off highway landings. All sites visited demonstrated excellent aesthetic considerations. (2, p. 5)

3. Field observations of completed operations and policies/procedures for visual quality were assessed during the evaluation. Recreational use and esthetics were priority concerns where appropriate. (3, p. 3)

Assessment of this criterion: The SFI audit demonstrates that DPPL has attained the identified goal and outcome for this criterion.
Criterion 5: Biological diversity

Goal: Maintain biological diversity with healthy populations of native flora and fauna, forest communities and ecosystems.

Outcomes:

1. Management addresses the habitat needs of the full range of species present.
2. Maintain or manage for acreage in the late successional (LS) condition through management and protection.
3. Maintain a reasonable component of standing dead trees, live cull trees, and down logs across the landscape (not necessarily on every acre).
4. High Conservation Value Forests are properly identified and values are protected on the ownership.
5. Rare, threatened and endangered species habitats are properly identified, and the land is managed to protect the habitats and occurrences of rare, threatened and endangered species.
6. Important plant communities are properly identified, and the land is managed to protect important plant communities.
7. Deer wintering areas are properly identified and managed to maintain or improve their value as winter cover for deer.

SFI Audit results:

Conformance to Objective 4 (Conservation of Biological Diversity)

Performance Measure 4.1. Program Participants shall have programs to promote biological diversity at stand- and landscape-levels.

Performance Measure 4.2. Program Participants shall apply knowledge gained through research, science, technology and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.

Conformance to Objective 6 (Protection of Special Sites)

Performance Measure 6.1. Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.

Findings:

1. Wildlife habitat considerations were evident on most field sites, including expansion of SMZ's when appropriate, maintenance of snag and mast trees in all harvest types and creation of irregular harvest boundaries during clearcut and release harvests. (1, p. 5

2. The bureau does a good job of implementing stand level habitat elements including retaining snags, mast, den and nest trees and large down woody debris. Additionally, they have worked to protect and enlarge deer yards on some properties. The bureau is managing to produce large diameter (i.e. older) trees. The bureau identifies and protects areas of potential old growth when planning and conducting forest management activities. (2, p. 5)

Assessment of this criterion: The SFI audit demonstrates that DPPL has attained the identified goal and outcome for this criterion.
Criterion 6: Public accountability

Goal: Demonstrate sustainable forestry and build public confidence that forest management is protecting public values for the long-term.

Outcomes:
1. The landowner will maintain independent 3rd party certification with a nationally recognized sustainable forestry management certification system without major, unresolved non-conformances on managed lands.
2. A Licensed Forester within the company will review and approve the landowner’s Forest Management Plan.
3. The landowner will employ Licensed Foresters who are actively involved in the management, planning and supervision of operations on the land.
4. All timber harvesting contractors will employ at least one person possessing Certified Logging Professional or Qualified Logging Professional certifications or the equivalent.

SFI Audit results:
The division has maintained its SFI certification.

Conformance to Objective 16 (Training and Education)
Performance Measure 16.1: Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI 2010-2014 Standard.
Finding: NON-CONFORMANCE - No evidence of a written statement of commitment to the SFI 2010-204 Standard was observed during the audit. (2, p. 5) FOLLOWUP - The organization has added a commitment statement to its policies and procedures manual. (1, p. 6)
Performance Measure 16.2: Program Participants shall work individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community to foster improvement in the professionalism of wood producers.
Finding: During its most recent certification audit, BPL received a Major Nonconformance: [BPL] did not have specific requirements for contractor safety and professional qualifications included in harvesting contracts. This issue was addressed as a minor CAR during last year [sic] renewal audit in the FSC standard and no corrective action implementation has occurred. This minor CAR has been issued as a major CAR in both FSC and SFI standards. (1, p. 11) This major CAR has now been corrected and signed off on by the auditor (Tom Charles email to Donald Mansius, 08 August 2013).

Assessment of this criterion: The SFI audit and follow-up information supplied demonstrate that DPPL has fully attained the identified goal and outcomes for this criterion.
Criterion 7: Economic considerations

Goal: Optimize benefits to the local and regional economy while also achieving the goals specified for the other criteria, to the extent allowed by market conditions.

Outcome: The landowner’s management activities support as vibrant and diverse a forest products industry as is practicable, including loggers, truckers, and production facilities.

SFI Audit results:

No SFI Objective fits with this criterion. However, BPL staff report that harvesting on all three OBF project areas was conducted by logging contractors local to the harvest sites. Some spruce and fir from the Round Pond hardwood seed-tree harvest was transported to Quebec, the usual destination for spruce and fir harvested west of the Allagash River, but all other wood from the three harvests was delivered to Maine mills by Maine truckers.

Assessment of this criterion: The follow-up information supplied demonstrates that DPPL has attained the identified goal and outcomes for this criterion (email from Tom Charles to Donald Mansius, 08 August 2013); however, it would be helpful if future certification audits addressed this issue specifically.
Criterion 8: Social considerations

Goal: The landowner supports the communities surrounding their lands and operations, and except where special circumstances dictate otherwise, the landowner continues to provide historic and traditional recreational opportunities that do not conflict with the Landowner’s objectives or values.

Outcome: The landowner provides opportunities for appropriate historic and traditional recreational uses that do not conflict with the landowner’s values or objectives.

SFI Audit results:

Conformance to Objective 5 (Management of Visual Quality and Recreational Benefits)

  Performance Measure 5.4. Program Participants shall support and promote recreational opportunities for the public.

  Finding: The ... Bureau ... is dedicated to providing high quality recreational opportunities on the public reserved lands. By providing boat launches, campsite [sic], Adirondack shelters, maintained portages, and hiking trails the Bureau provides an important service to the public.

Assessment of this criterion: The SFI audit demonstrates that DPPL has attained the identified goal and outcome for this criterion.
Criterion 9: Forest Health

Goal: The forest is healthy and vigorous with no serious insect infestations or disease outbreaks.

Outcome: The landowner does what is prudent and practicable to monitor for and prevent and control insects, disease, and fire, consistent with good practice in the industry and assists the MFS in forest health monitoring programs on the ownership.

SFI Audit results:

Conformance to Objective 2 (Forest Productivity)

Performance Measure 2.4. Program Participants shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and invasive exotic plants and animals, to maintain and improve long-term forest health, productivity and economic viability.

Finding: No specific statements germane to this performance measure were found in the audit reports. However, BPL staff report that the three OBF projects are designed to produce healthy forest stands of native species. The objective of the Round Pond project is to reduce the future dominance of the highly diseased beech common to the area, while increasing the proportion of yellow birch and sugar maple, trees with far less disease issues.

Assessment of this criterion: The follow-up information supplied demonstrates that DPPL has attained the identified goal and outcomes for this criterion (email from Tom Charles to Donald Mansius, 08 August 2013); however, it would be helpful if future certification audits addressed this issue specifically.