



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

16800 Greenspoint Park Dr., Suite 300 S  
Houston, TX 77060  
Phone (281) 986-1300: Toll Free (800) 937-9311

Company Name	St Louis, County of (Inc)
Contact Person	Ms Kristin Fogard
Address	320 W. 2nd St, Ste 302, Duluth, MN 55802-1495
Phone / Fax	218-726-2606
PQC Code	E01E: Forestry, logging related serv
Contract Number	US.2768621

Certification Audit:	<b>X</b>	Re-Certification Audit:		Surveillance Audit:	#	Scope extension audit:	
----------------------	----------	-------------------------	--	---------------------	---	------------------------	--

**Audit Summary**

**Introduction**

This report summarizes the results of St Lewis County, Inc’s Main audit conducted at their headquarters office in Duluth, MN, and field sites. Julie Stangell, Bureau Veritas Certification Lead Auditor conducted the audit on September 27-30, 2021. Ms. Stangell is a professional forester with more than 30 years of field experience and is an EMS/RABQSA certified lead auditor.

**Audit Scope, Objectives and Process**

The scope of the audit was Management of approximately 851,242 acres of St. Louis County Lands including planning, harvesting, transportation and silviculture meeting SFI 2015-2019 Standards and Rules®, Section 2 Objectives 1-15. The audit goal was to verify conformance to the SFI 2015-2019 Standard. All objectives were audited this main audit, St Lewis County was previously certified to the SFI Forest Management standard with NSF. The objective of the audit was to 1) verify that the Program Participant’s SFI Program is in conformance with the SFI objectives, performance measures, and indicators and to 2) verify whether the Program Participant has effectively implemented its SFI Standard program requirements. Standard Bureau Veritas protocols and forms were applied throughout the audit as provided by the current version of the Bureau Veritas Certification Auditor Handbook and supplemental SFI Handbook. Field notes and an SFI indicator checklist were completed and contain specific information and audit notes.

**Audit Plan**

The audit was conducted over a total of four days on September 27-30, 2021. A detailed daily audit plan is on file with Bureau Veritas Certification.

**Company Information**

Saint Louis County, through its Land and Minerals Department, manages State Tax Forfeited Trust Lands to provide a combination of resources for the sustained benefit of the people of Saint Louis County by establishing resource management programs based on responsible stewardship and sustainability. The County is the largest county east of the Mississippi River managing more than 850,000 acres in six zones from four field offices located in Pike Lake, Virginia, Cook and Ely. The central office is located at the Land and Minerals Department in downtown Duluth, MN. The mission of the Saint Louis County Land and Minerals Department is to promote, enhance and protect Saint

Louis County Tax Forfeited Trust lands by providing professional expertise in the use of sound land management principles for:

- Financial return to the county and taxing districts
- Performing public services
- Maintain and improving forest health and productivity
- Providing raw material for local industry
- Providing opportunity for tourism and recreation
- Protecting wildlife habitat, soil resources, and water quality
- Providing for scientific research

Saint Louis County Land and Minerals Department was originally certified to the SFI Standard in 2004 and has undergone surveillance and re-certification audits annually utilizing a different certifying body until contracting with Bureau Veritas in 2021.

Approximately 55% of the forest cover in the County is in the aspen/ birch forest type that readily regenerates naturally the next growing season following clear cut harvest. Approximately 18% of the forest cover is in black and white spruce and balsam fir. Eastern white pine, Norway (red) pine and jack pine make up about 7 % of the forest cover. Other species include Northern white cedar (5%), tamarack (6%), black ash (6%) and northern hardwoods made up of sugar maple, red maple, silver maple, basswood (3%).

### **Audit Results**

The audit consisted of document and record review, interviews of key employees and field site visits representing a broad spectrum of activities. Twenty field sites were visited managed from each of the field offices in Pike Lake, Virginia, Ely and Cook that were representative of their more difficult harvest, road maintenance, vegetation management and planting sites. All objectives were audited over the course of four days. There were no substitutions or modifications of any indicators.

**Objective 1-Forest Management Planning:** Saint Louis County has long term (5-year) and short term (1-year) harvest plans based on each management zone that indicate the number of acres to be sold on an annual basis. The number of acres sold and the number of acres harvested in a year differ due to the length of timber sale contracts. The County is transitioning to a new harvest model utilizing the help of a consultant who is working with parameters from the County to develop harvest levels. The 15-year-old model currently being used and the new model are producing a similar number of acres to be sold on an annual basis. The County has a thorough GIS system and inventory was updated over several years with completion in 2018. Planting and thinning are incorporated into the plan, there is no fertilization. The County has generally been selling fewer acres in timber sales than shown in the harvest planning model.

**Objective 2-Forest Health and Productivity:** The County utilizes the MN DNR site classification system, identifying native plant communities for each site. Multiple regeneration systems are used, natural regeneration is used in aspen; direct, aerial or natural seeding is used where natural regeneration is prescribed on non-aspen sites; Diversification planting may be used where a different species is to be emphasized changing species composition or to increase stocking of a particular species. Red pine, white pine, jack pine, white spruce, black spruce, tamarack, red oak are planted. Field observation indicated no reforestation issues with excellent aspen regeneration within 1 growing season. Field observed several pine plantations with excellent results; utilize bud capping for multiple years in pine to keep deer from browsing. Vegetation management is accomplished using occasional aerial application but mostly ground application. Aerial application is done in cooperation with the MN DNR. A notable practice was identified for exceptional use of BMPs during application. Soil maps are used for planning and evaluating conditions under which units will be harvested. A notable practice was identified for use of a clover mix to encourage pollinators when seeding is

necessary for erosion control. Black spruce is cut aggressively, and slash is flattened by machines during logging to prevent further infestation from spruce budworm. Other pests include Eastern larch beetle, tent caterpillar, emerald ash borer with no outbreaks of these pests over the last few years.

**Objective 3-Protection and Maintenance of Water Resources:** Saint Louis County Timber Harvesting Contract includes a provision for use of BMPs. Foresters and loggers trained in BMPs are involved in all aspects of management. Minnesota Site Level Guidelines (BMPs) are required and are built into timber sale planning, contracts, administration, and monitoring. Loggers must have BMP training. Inspections are done. Foresters plan and oversee all management activities. The County utilizes MN DNR Protected waters and National Wetlands Inventory maps as base for identifying water on timber sales.

**Objective 4-Conservation of Biological Diversity:** A Wildlife Plan incorporates wildlife elements into timber sales; Special Sites designation protects unique habitat. Wildlife elements are documented in the Timber Sale Synopsis following the Voluntary Site Level Forest Management Guidelines for wildlife. The department may develop internal guidelines for specific species as needed. Field staff review the Natural Heritage and Special Sites databases as part of timber sale reconnaissance and is documented in the Timber Sale Synopsis. Native Plant Community (NPC) types are identified as part of the planning process with specific goals related to NPCs. NPCs are coordinated with DNR and other entities as related to the overall landscape plan.

**Objective 5-Management of Visual Quality and Recreational Benefits:** A Rating system for visual sensitivity in place evaluating areas as high, moderate and low for visual sensitivity, mapped in GIS. No green-up issues were observed on the field audit. Lands are open for recreation as they are public lands. The County coordinates with USFS and DNR regarding possible closures due to very dry summer weather. Cabin leases are common, the lessee owns the cabin and leases land from the County. Many trails for snow mobiles, ATVs, Bicycles go through the property.

**Objective 6-Protection of Special Sites:** Special sites identified using natural heritage information, maintained by DNR. Updated annually in GIS system. If an additional site is identified while doing planning recon, the site may be added to the GIS layer.

**Objective 7-Efficient Use of Fiber Resources:** Every site visited had excellent utilization. Utilization is monitored by field foresters and documented. When a pulp mill in Duluth closed, contracts were revised to exclude areas of standing pulpwood so that wood stayed on the stump rather than being cut and left on the ground due to no market.

**Objective 8-Recognize and Respect Indigenous People's Rights:** A procedure is in place for the purpose of recognizing and respecting Indigenous Peoples rights and traditional knowledge. The Floodwood Zone managed from the Pike Lake office overlaps the Fond du Lac band reservation. The Band sprays invasive species on County land; the Fond du Lac wildlife management group collars wolves, coordinates with Zone foresters to notify of trap locations. Meetings with all stakeholders are documented in the Stakeholders Database with very thorough documentation.

**Objective 9-Legal and Regulatory Compliance:** A thorough reference of laws and regulations are on the internal website with active links. MN BMPs are followed that are voluntary, with BMPs incorporated into contract language. No legal actions have been taken. Per the DNR, they did BMP monitoring on Tax Forfeited sites in Saint Louis County in 2020 and 2021, but the results will not be ready until 2022.

**Objective 10-Forestry Research, Science and Technology:** The County actively supports research as part of the County Mission Statement is to make lands available for research. The County supports

multiple organizations as documented in the Research database: Research Coop Projects, involved in Minnesota Tree Improvement Cooperative, Natural Resources Research Institute; Cooperate with U of M, grad students do research on county lands.

**Objective 11-Training and Education:** The County's mission statement states a strong commitment to sustainable forestry. County employees receive annual training and are encouraged to seek training from other organizations. A Responsible Operator list is maintained by Saint Lewis County administrative staff verifying logger training is current and insurance is in place. Companies cannot bid on SLC sales if they are not on the list.

**Objective 12-Community Involvement and Landowner Outreach:** Public Outreach is documented on the County's internal website although outreach has been limited in the last year due to COVID. 5<sup>th</sup> grade outreach in conjunction with is taking place public meetings with adjacent landowners, concerned citizens. The County received an SFI-SIC Public Outreach grant to install bat boxes on County land.

**Objective 13-Public Land Management Responsibilities:** The County collaborates with DNR, USFS through the Arrowhead Group. Coordination with indigenous peoples through meetings. Due to recent fire danger , the County has been meeting with USFS and DNR to get all agencies on one page regarding fire restrictions – weekly meeting over the summer. As a result of the pulp mill closure in June 2020 in Duluth, they met with USFS and DNR regarding flexibility in contracts, how handle dealing with loggers related to balsam fir; balsam fir needs to be removed due to budworm. Established working relationship with agencies, coordination carrying on past the mill closure. The county makes a donation to Boulder Lake Environmental Center, collaboration with MN Power company and UMD (Univ MN Duluth).

**Objective 14-Communications and Public Reporting:** The SLC public summary for 2020 was available on the SFI website.

**Objective 15-Management Review:** A management system and compliance audit of Saint Louis County, MN, Land and Minerals Department was conducted from October 2020 through July 2021. The audit was conducted by a team of internal auditors and auditor trainees. Internal auditors are assigned a section to review and report back to the SLC internal auditor. A report to management was completed on 7/28/21.

## Findings

### Previous non-conformances:

St Louis County was previously certified by NSF to the SFI 2015-2019 Standard. No nonconformities were identified at the previous audit as verified on the publicly available audit report.

### Non-conformances:

No nonconformances were identified.

### Opportunities for Improvement:

No Opportunities for Improvement were identified.

### Notable Practices:

Two notable practices were identified:

- 2.2.8: The County requires GPS tracking for vegetation management activities at the time of application for both ground and aerial application. GPS tracks are submitted to the County and kept as part of the file for reference. In addition, the County flies blocks with fixed wing or in 2021, with a drone, using infrared photography to evaluate the effectiveness of ground and aerial application.
- 2.3.3: Use of a mix of clover for bees and pollinators where seeding was required for erosion control.

**Logo/label use:**

Saint Louis County does not use the SFI logo in printed format or on the County website. Sustainable Forest Management is mentioned on the Land and Minerals Tax Forfeited Trust Lands page however SFI is not directly referenced. The County does not intend to use the Bureau Veritas logo.

**SFI reporting:**

The audit report from 2020 was posted on the SFI website.

**Conclusions**

A closing meeting was held virtually on September 30, 2021, with participation from all offices. Audit results were discussed, questions asked and answered, and a date established for the 2022 audit. In the opinion of the auditor and based on the evidence presented, Saint Louis County meets all requirements of the SFI 2015-2019 Forest Management Standard. Immediate and continued certification is recommended.

**SEE SF61 FOR AUDIT NOTES**

<b>Summary of Audit Findings:</b>									
Audit Date(s):		From: September 27, 2021				To: September 30, 2021			
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:									
<b>Team Leader Recommendation:</b>									
Corrective Action Plan(s) Accepted		Yes	No	N/A	X	Date:			
Proceed to/Continue Certification		Yes	X	No	N/A	Date:		Sept 30 2021	
All NCR's Closed		Yes	No	N/A	X	Date:			
Standard audit conducted against:									
1)	SFI 2015-2019 Section 2 FM			3)					
2)				4)					
Team Leader (1):			Team Members (2,3,4...)						
Julie Stangell			2)						
			3)						
			4)						
			5)						
Scope of Supply: (scope statement must be verified and appear in the space below)									
Forestry Management									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	August 22-25, 2022								
Audit Report Distribution									
Saint Louis County : Kristin Fogard -- fogardk@stlouiscountymn.gov									
Bureau Veritas: Lorisa Love – lorisa.love@bureauveritas.com									

Clause	Audit Report
Opening Meeting	<p>Participants: Julie Marinucci, Director  Jason Meyer, Deputy Director  Mark Pannkuk, Area Manager (Pike Lake)  Dave Skurla, Area Manager (Virginia)  Toni Lonetto, Information Specialist Supervisor (Duluth)  Kristin Fogard, Resource Mgmt Supervisor/EMR (Duluth)  Nate Anderson, Forester III (Duluth office)  Halene Wehseler, Internal Auditor (County Auditor’s Office)  Julie Stangell, Lead auditor</p> <p>Discussions: &gt; Introductions  &gt; Scope of the audit  &gt; Audit schedule/plan  &gt; Nonconformance types – Major / Minor  &gt; Review of previous nonconformances - 0.  &gt; Process approach to auditing and audit sampling  &gt; Confidentiality agreement  &gt; Termination of the audit  &gt; Appeals process  &gt; Closing meeting timing</p>
Closing Meeting	<p>Participants: Julie Marinucci, Director  Jason Meyer, Deputy Director  Mark Pannkuk, Pike Lake Area Manager  Dave Skula, Virginia Area Manager  Kristin Fogard, Resource Group Manager  Nate Anderson, Forester III (Duluth Office)  Dawn Sathers, Auditor (Auditor’s Department)  Halene Wehseler, Internal Auditor (Auditor’s Department)  Julie Stangell, Lead Auditor</p> <p>Discussions: &gt; Introductions and appreciation for selecting Bureau Veritas Certification.  &gt; Review of audit process - process approach and sampling.  &gt; Review of OFIs and System Strengths  &gt; Nonconformances - 0  &gt; Date for next audit – Week of August 22, 2022  &gt; Reporting protocol and timing</p>