



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

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Company Name	St Louis County, MN
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PQC Code	E01E: Forestry, logging related serv
Contract Number	10861412

Certification Audit:		Re-Certification Audit:		Surveillance Audit:	#4	Scope extension audit:	
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Audit Summary
<p align="center">Introduction</p> <p>This report summarizes the results of the audit of St Lewis County, Minnesota. This was the forth surveillance audit, conducted at their Pike Lake office in Duluth, MN and field sites for the South area including the Brimson, Island Lake and Floodwood Zones. Julie Stangell, Bureau Veritas Certification Lead Auditor conducted the audit from August 11 to August 14, 2025. Ms. Stangell is a professional forester with more than 30 years of field experience and is a certified lead auditor. The audit was witnessed by ANAB auditor, Geoff Morris, Manager of Accreditation MVP and Lead/Technical Accreditation Assessor for ANSI National Accreditation Board.</p> <p align="center">Audit Scope, Objectives and Process</p> <p>The scope of the audit was, “Management of St. Louis County lands which are 100% state tax forfeit and/or 100% county owned fee lands under Land and Minerals control unless otherwise designated and includes activities such as planning, harvesting, transportation and silviculture on those lands.” The audit goal was to verify conformance to the SFI 2022 Standards and Rules[®], Section 2. Performance measure 1.1 and Objectives 2, 4, 5, 8, 9, 10, 15, 16 and 17 were audited at this surveillance audit. 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.</p> <p align="center">Audit Plan</p> <p>The audit was conducted on site over a total of three and a half days. A detailed daily audit plan was confirmed with the client prior to the audit and is on file with Bureau Veritas Certification.</p> <p align="center">Company Information</p> <p>Saint Louis County Land and Minerals Department manages State Tax Forfeited Trust Lands and County fee owned 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</p>

stewardship and sustainability. The mission of the Saint Louis County Land and Minerals Department is to promote, enhance and protect Saint Louis County managed forest 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
- Maintaining 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

St. Louis County, Minnesota, is the largest county east of the Mississippi River managing more than 850,000 acres of timber land. The area is managed from four field offices located in Pike Lake, Virginia, Cook and Ely with a central office in downtown Duluth. Based on the 2022 harvest schedule, The aspen cover type predominates about 37% of the total area, followed distantly by lowland black spruce (8%). Other cover types typical of the region can be found scattered across the forest in lesser amounts such as red, white and jack pine (5%), mixed northern hardwoods (2.5%) and small amounts of tamarack, cedar, ash and birch.

Saint Louis County Land and Minerals Department was originally certified to the Sustainable Forestry Initiative (SFI) Standard in 2004 and continues with annual surveillance audits and re-certification audits every 5th year.

Audit Results

The audit consisted of document and record review, interviews of key employees and field site visits representing a broad spectrum of activities. The audit began with one half day at the Pike Lake office in Duluth where Objectives 2, 4, 5, 8, 9, 10, 15, 16, 17 and Performance Measure 1.1 were audited. The next three days were spent at the South District where twenty field sites were visited in the Brimson, Island Lake and Floodwood units. The sites visited were representative of their more difficult harvest, road maintenance, vegetation management and planting sites as well as special sites. There were no substitutions or modifications of any indicators.

Objective 1-Forest Management Planning: Saint Louis County has transitioned to a new harvest model utilizing the help of a consultant working with parameters from the County to develop harvest levels. The new model was rolled out to staff in February 2023 with plans to recalculate in late 2025 with minor adjustments following the testing phase. The model indicates the number of acres to be harvested every 5 years broken out by zone, species and cover type/ productivity/ age class group, indicating the number of acres to be harvested in each cover type over the 5-year period. Sewell Forestry built the model, based on Woodstock. The model indicates timber sale levels in cords, with projected harvest levels about the same as the past. Annual sale levels will be in acres moving forward. 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 consistently harvesting less than is modeled due to weak markets in the area.

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 is an active participant in the Arrowhead Landscape Project to collaborate with other landowners to evaluate on a regional basis social, environmental and economic impacts of forestry across ownerships.

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; diversification planting may be used where a different species

are 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, and red oak are planted. Field observation indicated minimal reforestation issues with excellent aspen regeneration within 1 growing season. Several pine and mixed species plantings were observed with excellent results; the County utilizes bud capping for multiple years in pine to keep deer from browsing seedlings. Vegetation management is accomplished using occasional aerial application but mostly ground application. Aerial application is done in cooperation with the MN DNR however there was no aerial application this audit year, all application was done with ground-based equipment with a spray boom. Soil maps are used for planning and evaluating conditions under which units will be harvested. County staff do an outstanding job of protecting soil through use of seasonal harvest restrictions.

Objective 3-Protection and Maintenance of Water Resources: This objective was not audited however a minor nonconformity was written based on observations made on the field audit. See Findings below.

Objective 4-Conservation of Biological Diversity: The County supports the SFI SIC in MN and regionally in conjunction with WI and MI. Staff discussed efforts to increase diversity on the landscape by utilizing diversity plantings where pine, oak and spruce were planted in stands where it was anticipated aspen would dominate the landscape.

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 generally open for recreation as they are public lands. The County coordinates with USFS and DNR regarding possible closures due to dry weather. The county leases about 700 cabins where the lessee owns the cabin and leases land from the County. Each cabin is evaluated on a standard form every three years to ensure compliance with the agreement. Many trails for snow mobiles, ATVs and bicycles go through the property. Leased cabins and trails were observed on the field audit.

Objective 6-Protection of Special Sites: Not audited

Objective 7-Efficient Use of Fiber Resources: Not audited

Objective 8-Recognize and Respect Indigenous People's Rights: The St Louis County Environmental Policy includes 'Recognize and Respect the Rights of Indigenous Peoples', also included as a guiding policy on Indigenous Peoples. County employees routinely reach out to several local bands and have had meetings related to special sites and communication far enough in advance of timber sales and other activities to ensure sensitive sites are protected. Meetings with all stakeholders are documented in the Stakeholders Database with very thorough documentation.

Objective 9-Climate Smart Forestry: St. Louis County has identified climate risks for each zone with education for their staff on research relative to climate issues. They are working with the MI, WI, MN SICs to identify risk and ensure their plans mesh with other organizations in the region. The County is part of the Arrowhead project to collaborate with other landowners with a County manager on the climate committee. There is a climate group within the county with a full-time employee starting in September that will rotate through county departments to identify opportunities. Part of NE Regional Landscape Committee, keeping tabs on what other agencies are doing before jump into changes related to species mix. Active forest management i.e., inventory, GIS, allows for monitoring changes in species mix to show changes over time.

Objective 10-Fire Resilience and Awareness: Wildfire hazard potential was evaluated using an on-line tool that shows lands in the south zone are relatively low risk for fire hazard. There were three

human-caused wildfires in the county this year, the county did an excellent job of quickly salvaging timber. Lands are managed to reduce fuel load, with healthy, younger stands. Timber sale blocks break up fire probability. Less intensively managed surrounding lands are more susceptible to fire with budworm damage a significant issue.

Objective 11-Legal and Regulatory Compliance: Not audited

Objective 12-Forestry Research, Science and Technology: Not audited

Objective 13-Training and Education: This objective was not audited however a minor nonconformity was written based on observations made on the field audit. See Findings below.

Objective 14-Community Involvement and Landowner Outreach: Not audited

Objective 15-Public Land Management Responsibilities: Timber sales are approved by the County Board, the gives public input to the county board. Staff work with Fond du Lac band for input and meet with DNR annually to coordinate harvest. The County collaborates with DNR and USFS through the Arrowhead Group emphasizing working relationship with agencies. Coordination with indigenous peoples is accomplished through meetings, emails and telephone calls.

Objective 16-Communications and Public Reporting: The Public Summary Report was completed in a timely manner. Last year's audit report was posted on the SFI website.

Objective 17-Management Review: A thorough internal audit was completed in July 2025. A sample of active harvests were audited and reviewed by area managers. Review is ongoing with 3 OFIs noted, 1 finding (NC) related to staff training with follow-up training scheduled. There was a thorough review of SOPs with notes on updates to be made and follow-up on findings from the previous year's review. Audits are ongoing throughout the year on a cyclical schedule, practices and procedures are thoroughly reviewed. SOPs are reviewed internally in late winter with updated dates recorded. The internal audit and management review system is well documented, fully functioning and effective.

Findings

Previous non-conformances:

No previous nonconformities were identified.

Non-conformances:

Two minor nonconformances were identified:

Per 3.1.3, there was inconsistent implementation of the County's spill kit requirement, and the inspection form was not being correctly used related to water crossings/ water crossings on site.

Per 13.1.4, SLC training had expired for an active logger, per the Responsible Operators list. Current training is also a requirement of Section 4 of the timber sale contract.

These objectives were not on the list to be audited however observations were made during the field audit where implementation of all objectives were observed.

Opportunities for Improvement:

No opportunities for improvement were identified.

Notable Practices:

No notable practices were identified.

Logo/label use:

The SFI wordmark is correctly used on the stlouiscountymn.gov website, approval for use was updated in 2025. No other use of SFI logos or wordmarks were observed. The BVC logo is not used.

SFI reporting:

Verified that the audit report from the 2024 audit was posted on the SFI website as required.


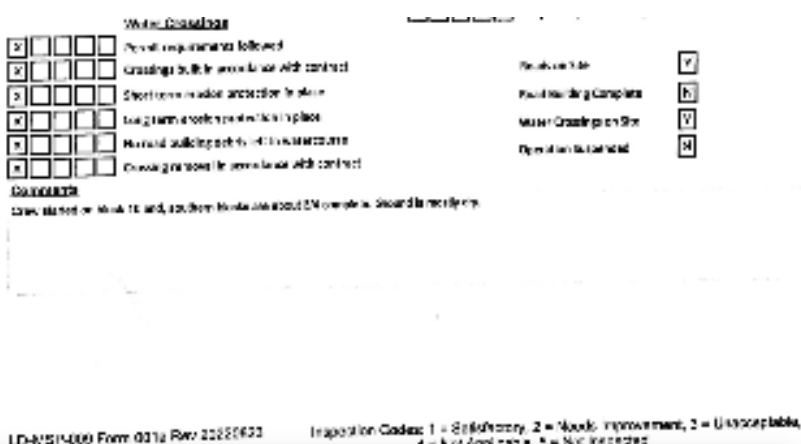
Conclusions

A closing meeting was held on August 14, 2025 at the Pike Lake office, with virtual participation by staff at other offices. Audit results were discussed, questions asked and answered, and timing and expectations discussed for closing nonconformities. The St Louis County environmental management system continues to be well managed and communicated to staff. In the opinion of the auditor and based on the evidence presented, Saint Louis County meets all requirements of the SFI 2022 Forest Management Standard except where noted, continued certification is recommended.

SEE SF61 FOR AUDIT NOTES

Summary of Audit Findings:									
Audit Date(s):		From: August 11, 2025				To: August 14, 2025			
Number of SF02's Raised:			Major:		0		Minor:		2
Is a follow up visit required:		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	Date(s) of follow up visit:			
Follow-up visit remarks:									
Team Leader Recommendation:									
Corrective Action Plan(s) Accepted		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	
Proceed to/Continue Certification		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	Aug 14, 2025
All NCR's Closed		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	
Standard audit conducted against:									
1)	SFI 2022 Forest Management			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)									
Management of St. Louis County lands which are 100% state tax forfeit and/or 100% county owned fee lands under Land and Minerals control unless otherwise designated and includes activities such as planning, harvesting, transportation and silviculture on those lands.									
Accreditation's		ANSI							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	August, 2026 (TBD with Kristin)								
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: Nate Anderson, Deputy Director Land & Minerals Jason Meyer, Director Land & Minerals Josh Carlson, Area Manager (Pike Lake - South) Dave Skurla, Area Manager (Virginia - North) Halene Wehseler, Internal Auditor Marc Kujawa, Internal Audit Analyst Senior Stacy Melcher, Resource Management Supervisor Dawn Sathers Financial Analyst Geoff Morris, ANAB Manager of Accreditation - MVP Julie Stangell, Lead auditor</p> <p>Discussions: > Introductions > Scope of the audit > Audit schedule/plan > Nonconformance types – Major / Minor > Review of previous nonconformances - 0. > Process approach to auditing and audit sampling > Confidentiality agreement > Termination of the audit > Appeals process > Closing meeting timing</p>
Closing Meeting	<p>Participants: Nate Anderson, Deputy Director Land & Minerals Jason Meyer, Director Land & Minerals Josh Carlson, Area Manager (Pike Lake - South) Dave Skurla, Area Manager (Virginia - North) Marc Kujawa, Internal Audit Analyst Senior Stacy Melcher, Resource Management Supervisor Dawn Sathers Financial Analyst Geoff Morris, ANAB Manager of Accreditation - MVP Julie Stangell, Lead auditor</p> <p>Discussions: > Introductions and appreciation for selecting Bureau Veritas Certification. > Review of audit process - process approach and sampling. > Review of OFIs and System Strengths > Nonconformances – 2 minor > Closing of nonconformities > Date for next audit. > Reporting protocol and timing</p>

		<h2>SF02 NON-CONFORMITY REPORT</h2> <h3>Wood Schemes</h3>	
Date	Client Name and Site:	<u>SF02#:</u>	
Aug. 14, 2025	St Louis County	JMS/01	
Non-conformity Observed During:		Surveillance Audit #4	
Process:		BMP implementation/ protection of water resources	
Standard / Reference Document:		SFI 2022 Forest Management Standard	
Clause:		3.1.3	
REQUIREMENT OF AUDITED STANDARD:			
3.1.3 Monitoring of overall best management practices implementation			
STATEMENT OF NON-CONFORMITY:			
1) Inconsistent implementation of spill kit requirement.			
2) Inspection form not being correctly used related to water crossings/ water crossings on site.			
OBJECTIVE EVIDENCE FOR RAISING NON-CONFORMITY AND JUSTIFICATION OF THE GRADE			
1) Variability in how BMPs around spill kits and content requirements of spill kits are administered and documented. Contract specifies requirements in section 15d, bottom of prework form specifies spill kits must be on site. Spill kits checked on 5 active operations, inconsistent evidence of compliance, inconsistency in contract administrators documenting that spill kits checked.			
2) On Harvest inspection form, at the bottom of form, water crossings checked as 'yes' on site, 6 items to be checked all checked as satisfactory – however no water on site. Found on multiple sales, both Brimson and Island Lake.			
 <p>Water Crossings</p> <p>Personal requirements followed <input type="checkbox"/></p> <p>Grassings built in accordance with contract <input checked="" type="checkbox"/></p> <p>Spill kits on location accessible to all <input type="checkbox"/></p> <p>Log jams on location accessible to all <input type="checkbox"/></p> <p>Harvest activities prohibited in all <input type="checkbox"/></p> <p>Clearing operations in accordance with contract <input type="checkbox"/></p> <p>Final check table <input checked="" type="checkbox"/></p> <p>Final handling complete <input type="checkbox"/></p> <p>Water Crossings on Site <input checked="" type="checkbox"/></p> <p>Operation terminated <input checked="" type="checkbox"/></p> <p>LD-NSI-009 Form 031a Rev 22250623 Inspection Codes: 1 = Satisfactory, 2 = Needs improvement, 3 = Unacceptable, 4 = Not Applicable, 5 = Not Inspected</p>			
Grade	Lead Auditor	Auditor raising NCR	Client Representative
Minor	Julie Stangell	NA	Kristen Fogard/ Nate Anderson
To be Completed Before:	Root cause analysis and corrective action plan within 30 days (Sept 13, 2025); Evidence of implementation of corrective action plan before August 14, 2026 or next audit, whichever is first.		
ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION *			

Date of the beginning of this deviation: Correction: Root Cause: Corrective Action:	
Implementation of CA	Date of Completion*
	Client Representative*

CLEARANCE REPORT					
Validation of Corrective Action plan					
Corrective Action Accepted	Yes		No		
Auditor:				Date:	
Verification of implementation					
Auditor:				Date:	

	<h2 style="margin: 0;">SF02 NON-CONFORMITY REPORT</h2> <h3 style="margin: 0;">Wood Schemes</h3>	
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Date	Client Name and Site:	<u>SF02#:</u>
Aug. 14, 2025	St Louis County	JMS/02

Non-conformity Observed During:	Surveillance Audit #4
Process:	Training and Education
Standard / Reference Document:	SFI 2022 Forest Management Standard
Clause:	13.1.4

REQUIREMENT OF AUDITED STANDARD:
 Contractor education and training sufficient to their roles and responsibilities.

STATEMENT OF NON-CONFORMITY:
 SLC training expired for active logger, per the Responsible Operators list, requirement of Section 4 of contract.

OBJECTIVE EVIDENCE FOR RAISING NON-CONFORMITY AND JUSTIFICATION OF THE GRADE
 Logger working on F23-542121 training expired on 4/15/2025.

Grade	Lead Auditor	Auditor raising NCR	Client Representative
Minor	Julie Stangell	NA	Kristen Fogard/ Nate Anderson

To be Completed Before:	Root cause analysis and corrective action plan within 30 days (Sept 13, 2025); Evidence of implementation of corrective action plan before August 14, 2026 or next audit, whichever is first.
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ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION *

Date of the beginning of this deviation:

Correction:

Root Cause:

Corrective Action:

Implementation of CA	Date of Completion*	
	Client Representative*	

CLEARANCE REPORT

Validation of Corrective Action plan

Corrective Action Accepted	Yes		No		
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Auditor:		Date:	
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Verification of implementation

Auditor:		Date:	
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