



**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	Port Blakely Tree Farms
Contact Person	Eric Cohen
Address	8133 River Drive SE Tumwater, WA 98501
Phone / Fax	360-596-9425/ 360-570-0311
PQC Code	E01E
Contract Number	US 3272975

Certification Audit:		Re-Certification Audit:		Surveillance Audit:	#1	Scope extension audit:	
----------------------	--	-------------------------	--	---------------------	----	------------------------	--

Audit Summary
<p align="center">Introduction</p> <p>This report summarizes the results of the first surveillance and upgrade audit on Port Blakely Tree Farms (PBTF) SFI program for forest management operations in Washington and Oregon. Richard Boitnott, Bureau Veritas Certification Lead Auditor, conducted the audit May 10th through the 12th, 2022. Mr. Boitnott is an SAF certified forester, a Texas accredited forester, and has wildlife management expertise. He worked for forest industry for 22 years in a variety of forestry and wildlife management positions before beginning his consulting career over 20 years ago.</p> <p align="center">Audit Scope, Objectives and Process</p> <p>The scope of the audit is “Forest Management operations in Washington and Oregon”. The audit was conducted against the SFI 2022 Forest Management Standard. Objectives 1-14, 16 and 17 were covered during the audit. This audit served as an upgrade to the 2022 standard. There was no substitution or modification of indicators. Specifically, 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. Standard Bureau Veritas Certification protocols and forms were applied throughout the audit as provided by the most recent version of the Bureau Veritas Certification SFI Auditor Handbook available on the auditor access website.</p> <p align="center">Audit Plan</p> <p>The surveillance/upgrade audit was conducted over a total of three days; one day of document review on May 10th, followed by two days of field audit the 11th and 12th. A closing meeting was held at the end of the day on the 12th. An audit plan was developed and is maintained on file by Bureau Veritas Certification.</p> <p align="center">Company Information</p> <p>Port Blakely (PBTF) is a family-held, multi-generational forestland owner in the states of Washington and Oregon, in operation since 1864. They have been certified to the SFI Forest Management Standard since 2002. They manage three tree farms from their central office in Tumwater, Washington: Central Washington, Southwest Washington and Northwest Oregon. Their forests are located on the west side of the Cascade Range with the predominant species being</p>

Douglas-fir, Western hemlock and Western red cedar. Regeneration is accomplished through clearcutting, followed by chemical site preparation and planting, typically of Douglas-fir although Noble fir and Western red cedar are also planted. PB has a multiple species Habitat Conservation Plan and a Safe Harbor Agreement, both with the United States Fish and Wildlife Service and a Stewardship Agreement with the State of Oregon for their Northwest Oregon properties. Forest practices acts (FPAs) are in place in both states where the company operates. These FPAs prescribe many activities that support the company's SFI program. Riparian protection is heavily regulated and monitored by state agencies. Wildlife management practices are also regulated, with the amount of standing retention and downed woody debris also controlled by the Oregon and Washington FPAs. This audit was focused on the southwest Washington and central Washington tree farms.

Multi-Site Requirements

N/A

Audit Results

The document review was conducted to determine if Port Blakely's is operating a management system that meets the requirements of the SFI 2022 Forest Management Standard. The field audit consisted of a review of four harvest sites, and five regeneration sites, three of which had received a herbicide application. Two harvest sites were active at the time of the audit. The contractor were interviewed to determine petroleum spill response, fire response, training, and soil and RMZ protection.

Objective 1-Forest Management Planning:

Forest inventory is at the stand level. Inventory is housed in Cengea. Stands are monitored for regeneration success, then inventoried at age 12 and 20, and then re-inventoried every 5-7 years after age 30. Plots on 12-year-old stands are a combination of on-site and satellite imagery. Woodstock is used for harvest scheduling. The objective is to have a non-declining yield. Oregonon is used as the growth and yield. Cut-out analysis from 2008 until 2021 shows harvest levels within 4% of projected, indicating the growth and yield is fairly accurate in predicting future inventory levels. The long-term plan shows very little decline in inventory over the next 100 years, indicating the long-term model is sustainable. A GIS is in place containing all the layers needed to manage the forest, including soils, hydrology, unstable slopes, and T&E and FECVs. Lands are classified according to species composition, riparian areas, unstable slopes, non-forest area, and special sites. The company has enrolled about 10,000 acres in a carbon off-set program. The company also has a habitat conservation plan and a safe harbor agreement in Washington, and a stewardship agreement in Oregon that it expects to morph into a habitat conservation plan. The company used published data to determine the social and economic effects of its forest management plan. Port Blakely has a number of efforts in place, including the above-mentioned initiatives that address environmental impacts of its forest management plan.

Forest cover type conversions generally do not occur. The company is also aware of the requirement to notify receiving mills that wood coming from conversions to non-forest uses is not to be counted as SFI certified, although this never happens.

Objective 2-Forest Health and Productivity: All regeneration is conducted artificially. All harvested stands are planted well within two years. Regeneration sites are surveyed for survival during the fall of the year it was planted. Stands are required to have a 70% survival rate, or they are re-planted or inter-planted. No exotic tree species are planted.

PBTF's policy is to use the minimum amount of chemical necessary to control the vegetation present on each site. It practices integrated pest management in its regeneration activities by making site specific prescriptions on each site that may include no chemical site prep. Of the five regeneration

tracts reviewed during the audit, two did not receive a chemical site preparation treatment, although a release spray may be needed depending on competing vegetation. The company is also looking at biological controls for invasive species instead of applying herbicides, although some invasives require a chemical treatment. Herbicide applications were very well done. Hand spraying was done in proximity to houses or other high-risk areas. No drift into off-target areas was observed. All applications are conducted by licensed applicators, and personnel responsible for making herbicide prescriptions also carry a pesticide applicators license. All chemicals applied are registered and labeled for forestry use in the states of Oregon and Washington. No WHO type 1A or 1B pesticides are used, nor any banned by the Stockholm Convention.

Soil productivity was well protected on all harvest sites reviewed during the audit. Soils are mapped, including the presence of deep-seated landslides. Erosion control methods were in place, mostly through the use of water bars.

Objective 3-Protection and Maintenance of Water Resources: All harvest sites reviewed during the audit met or exceeded the Washington FPA riparian buffer requirements. Sites are a combination of shovel logged or cable skidded, although the company has a considerable amount of land that lends itself to ground-skidding. No damage to riparian areas was observed. Sites are monitored at least weekly to ensure compliance. The company has an environmental review process whereby every proposed harvest is reviewed by a wildlife biologist. This review includes an examination of stream characteristics, including fish presence. Contracts contain requirements to meet state FPAs.

The company's compliance with state FPAs requirements for BMP compliance helps assure the maintenance of water quantity. Port Blakely also identifies wetlands and other water storage features. Installation of large woody debris on small and medium streams stores water flow. Also, installation of beaver dam analogs helps distribute water flow. Water Resource Inventory Areas are in process in both states that will quantify the impacts of the company's harvesting activities on water quantity. This data will be analyzed on a periodic basis to determine the long-term impacts of the company's forest management activities on water quantity.

Objective 4-Conservation of Biological Diversity: The primary T&E species the company encounters are the northern spotted owl, marbled murrelet, and anadromous fish species. No spotted owls or marbled murrelets are known to occur on PBTF property, but they are located on adjacent public land. The company has addressed the potential occurrence of these species with a multi-species habitat conservation plan (HCP) in place on the Brooklyn tree farm in Washington, focused on the northern spotted owl. It requires the company to maintain some young forest foraging habitat. The company has implemented a stewardship agreement in Oregon, under which it is retaining four trees per acre instead of the two required by the Oregon FPA. There is an effort in place to convert the stewardship agreement into a habitat conservation plan. A safe harbor agreement is also in place on 45,000 acres in Washington.

As with water quality and fish presence, all potential harvest units are reviewed by a wildlife biologist prior to harvesting for any potential T&E species and FECVs. The permitting process in Washington and notification process in Oregon includes a review of species of concern by state agencies that goes well beyond G1/G2. The harvest can proceed once habitat requirements for any identified species are addressed by the company. However, PBTF does not solely depend on this review by the states. It gathers this information from each state so it knows what species need to be addressed before the permit or notification is submitted.

The company does not have true old-growth stands on its property. However, the retention of riparian zones and set-aside areas will produce old-growth characteristics in the future. All foresters interviewed during the audit were well aware of the potential invasive species that could occur on

company property. The most prevalent is scotch broom and reed canary grass, but there are a number of other species.

The company has wildlife biologists on staff who are quite involved in both gathering biodiversity-related research information and conducting studies on their own. PBTF has done an excellent job of using and conducting research to improve its operations, not just arrive at a predetermined conclusion. The company continues to implement a pre-commercial thinning (PCT) operation to establish gaps in PCT units to create pockets of early successional habitat. The company is implementing information from a retained structures study by NCASI by retaining upland patches, going beyond FPA requirements for standing retention.

Objective 5-Management of Visual Quality and Recreational Benefits: The company has a process to evaluate the visual quality of a sale. However, PBTF does not have land in proximity to scenic highways, although it will take measures to address aesthetics even outside of scenic highways. The average clear-cut size for 2021 was 66 acres, including fire salvage in Oregon. Washington makes it difficult to clearcut more than 120 acres, and the Oregon FPA does not allow any clearcut larger than 120, except for catastrophic circumstances, such as a wildfire. It is highly unlikely PBTF will be close to a 120 acre average, except due to catastrophic events.

The process for calculating clear-cut size is defined. The company simply divides the total acreage clear-cut in a year by the number of units, regardless of the presence of a buffer or riparian area wide enough to separate the unit according to FPA requirements. This is a very conservative method of calculating average clear-cut size. PBTF utilizes the legal requirements of both state's FPAs as the method for determining green-up. All harvest units reviewed during the audit were in compliance with the Washington FPA green-up requirement. Recreational access is allowed, although most roads are gated and access is limited to walk-in only, or it may be restricted during high fire danger.

Objective 6-Protection of Special Sites: There are not a lot of special sites other than ecological on PBTF property. A few cultural sites are known to occur, but these are not mapped at the request of the local tribes. Some other cultural sites, like old homesteads, are mapped.

Objective 7-Efficient Use of Fiber Resources: Utilization was acceptable on all harvest units observed during the audit. Each state's FPA specifies the number of standing retention trees and downed woody debris that must be retained on each harvest site. The company also has some agreements that specify more than FPA requirements. These requirements were more than met on each harvest site reviewed during the audit.

Objective 8: Recognize and Respect Indigenous People's Rights: PBTF has a written policy to respect the rights of indigenous peoples that meets the requirements in PM 8.1, Ind, 1. Local tribes can provide input through the permitting process in Washington and notification process in Oregon. This input is generally focused on stream mapping or other water projects. However, the company goes far beyond regulatory requirements. It has granted access to PBTF land to identify culturally modified trees, conduct cedar bark peeling, and look for other artifacts the tribes consider important. The company has provided tribes with written permission to hunt on company land in Washington, something not allowed by the state without written permission. PBTF recently donated coastal land historically used by tribes for fishing and shellfish gathering. The company does an outstanding job of interacting with indigenous peoples, going out of its way to be proactive. Its efforts warranted a notable practice.

Objective 9-Climate Smart Forestry: PBTF identified the risks to its forest operations from the impact of climate change using published data and its own observations. Risks include increased wildfire and the impacts of increased temperature and drought on seedling survival. Climate models

predict increase winter precipitation, resulting in threats to culverts and other water control structures. The company has already been conducting climate adaptation, experimenting with migrating Douglas Fir seed stock from south Oregon (termed assisted migration), believing these trees are better genetically adapted to a drier climate. The company is planting more plugs and applying herbicides to drier sites to provide seedlings a chance to retain as much moisture as possible. PBTF has already been oversizing its culverts more than required.

The company has access to the Pacific Northwest adaptation strategies. The assisted migration work is part of this regional strategy. PBTF's control of invasive species and its hydrology work is also in agreement with this strategy. The company promptly reforests, well within two years to provide climate enhancement, and has fire plans in place to limit the occurrence of wildfire and the subsequent emission of greenhouse gases.

Port Blakely has developed a program to identify and address greenhouse gas emission but has not yet fully implemented this across the company. It intends to rely on NCASI modeling for greenhouse emissions that has only recently been developed. Given the company has the framework in place with a goal of having this done by the end of the year, the lead auditor did not believe a non-conformance was warranted and issued an opportunity for improvement to ensure the company meets its goal by the end of the year.

Objective 10-Fire Resilience and Awareness: Historically the risk of wildfire is not great on the west side of the Cascades. However, this was not the case during the Labor Day fire complex of 2020 which impacted many landowners, including PBTF. The company is also adjacent to much public land, which could increase its risk. The risk could also rise as a result of climate change. PBTF manages stand density to reduce the risk of catastrophic wildfire. The company also abides with state fire restrictions, implementing shutdowns and requiring fire equipment on logging jobs. The company also has five fire engines itself, and personnel trained to operate them. A fire plan is developed each year.

PBTF addressed the potential impact of the Riverside and Beachie Creek fires in Oregon (9.5K acres) by addressing the damage to its road system and taking actions to mitigate damage to soil productivity and water quality and quantity. The company reforested as soon as it could following harvest. PBTF aerielly seeded burned riparian buffers to mitigate the damage from wildfires. The company also supported a study on the economic impacts from the fire on future wood flow.

PBTF cooperate with state agencies in fire detection, prevention and suppression. The company also provides monetary contributions to local fire agencies. PBTF participates in the SICs in Washington and Oregon that provides some information on the impacts of wildfire. A PBTF employee is on the board of Oregon Green, which among other things provides information on the detrimental impacts of wildfire and ways to prevent said fires. Another PBTF employee is the director of the Clackamas Marion Forest protection association, which helps with protection measures from ODF. The company also hosted a program to promote protection of the forest from wildfires.

Objective 11-Legal and Regulatory Compliance: Relevant regulations in the form of each state FPAs are available on the company's Sharepoint site. The permitting process in Washington and notification process in Oregon is in place to ensure regulatory compliance. An environmental review process is also in place to ensure compliance. Employee and contractor training, pre-harvest planning and inspection processes are also in place to help ensure compliance. There have been no adverse regulatory actions taken against PBTF operations in the past. The company has a written policy to company with social laws. It has included policies addressing diversity inclusion and gender equality.

Objective 12-Forestry Research, Science and Technology: PBTF is a member of NCASI. Its membership includes contribution towards a variety of research topics. The company is also directly involved in research as well as being a member of a number of coops. PBTF continues to do an excellent job of conducting research and using the results to improve its operations, not just arrive at a predetermined conclusion to justify its actions.

The company does not conduct research on genetically engineered trees. PBTF's participation in the Washington and Oregon SICs includes access to biodiversity conservation information distributed by the SICs. In addition, the company cooperates with bio-annual compliance monitoring conducted by the state agencies.

Objective 13-Training and Education: The president of U.S operations sends out an annual letter to all employees documenting the company's commitment to the SFI standard. Training records verified more than ample training takes place each year for all forestry employees. Contractors are required to have at least one person on each job who has been trained according to the requirements of each SIC. The logging contract also contains this requirement. The SICs are in the process of revamping their logger training programs to meet the new standard. Oregon has an annual continuing education component. Washington's was not clear in the past, but will meet the new two-year requirement.

Objective 14-Community Involvement and Landowner Outreach: PBTF financially supports the SICs in both states. The company is quite engaged in the development of HCPs, safe harbor agreements, and conservation agreements that contain conservation objectives while providing for a working forest.

The Washington and Oregon SICs have not yet updated their landowner information to meet the new standard, particularly as it pertains to the reporting of inconsistent practices. PBTF was issued an opportunity for improvement to make sure the SICs make that change.

Port Blakely continues to operate an environmental education program that is way beyond the size of the company. Three employees are dedicated to providing public outreach, particularly to school children. The company has probably provided education to close to 100,000 students, given they were at 99,000 students, teachers and their parents last year since its inception 30 years ago. PBTF continues to conduct environmental education at a level far beyond the size of the company.

Objective 15: Public Land Management Responsibilities: PBTF does not have responsibilities on public land.

Objective 16-Communications and Public Reporting: The 2021 renewal audit report was posted to the SFI website. All records necessary for reporting to SFI are maintained electronically and were reviewed as part of this audit. Submission of the 2021 SFI annual progress report has been delayed by SFI, Inc.

Objective 15-Management Review and Continual Improvement: PBTF has a defined management review process which outlines the information to be presented to management to determine the company's performance relative to the SFI Standard. The company is relatively small, so there is much interaction within management on a daily basis, including items covering SFI. The company greatly improved its documentation of meetings specific to SFI in response to an opportunity for improvement issued last year.

Findings

Previous non-conformances:

No non-conformances were issued during the previous audit.

Non-conformances:

No non-conformances were issued during this audit.

Opportunities for Improvement:

Two opportunities for improvement were issued. These should be considered in light of how they may affect conformance in the future.

1. PM 9.2, Ind. 3: Port Blakely has developed a program to identify and address greenhouse gas emission, with a goal of having this information by the end of the year. It intends to rely on NCASI modeling for greenhouse emissions that has only recently been developed. Given the time constraints in meeting the new standard, this has not yet been fully implemented across the company. An OFI was written to ensure the company meets this goal by the end of the year.
2. PM 14.1 Ind. 2: Port Blakely should work with the SICs in Washington and Oregon to ensure its landowner information contains all the requirements of this indicator, particularly inclusion of reporting of inconsistent practices.

Notable Practices:

One notable practice was issued:

1. PM 8.3, Ind. 2: Port Blakely's interactions with local indigenous peoples is outstanding. The company recognizes the land it has owned for well over 100 years is land formerly occupied by Native Americans, who were displaced by the Medicine Creek Treaty of 1854. The company has reached out to two local tribes, providing them access to Port Blakely property to search for culturally modified trees, conduct cedar bark peeling, and search for other artifacts important to the tribe. It also allowed access to company land for hunting, something not allowed for indigenous peoples on private land by the state without written permission. Port Blakely also recently donated a stretch of coastal land adjacent to a reservation that was considered ancestral land used for fishing and shellfish gathering. The company's willingness to engage and the level of engagement with local indigenous peoples is considered a commendable practice, particularly given the relatively small size of the company.

Logo/label use:

PBTF uses the SFI logo on its website with approval. PBTF also uses the BV logo on their website with approval.

SFI reporting:

The 2021 renewal audit report was found on the SFI website as required for public review.

Review of Previous Audit Cycle

N/A

Conclusions

Results of the audit indicate Port Blakley Tree Farms has developed and implemented a management system to meet the SFI 2022 Forest Management Standard. Since no non-conformances were issued, the company is recommended for upgrade to the 2022 standard.

SEE SF61 FOR AUDIT NOTES

Summary of Audit Findings:									
Audit Date(s):		From: March 10, 2022				To: March 12, 2022			
Number of SF02's Raised:			Major:		0		Minor:		0
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 type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	Date:	
Proceed to/Continue Certification		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>	Date:	5/12/2022
All NCR's Closed		Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>	Date:	
Standard audit conducted against:									
1)	SFI FM 2022			3)					
2)				4)					
Team Leader (1):		Team Members (2,3,4...)							
Richard Boitnott; CF		2)							
		3)							
		4)							
		5)							
Scope of Supply: (scope statement must be verified and appear in the space below)									
Forest Management operations in Washington and Oregon									
Accreditation's		ANAB							
Number of Certificates		1							
Proposed Date for Next Audit Event									
Date	May 9-11, 2023								
Audit Report Distribution									
PBTF: Eric Cohen-ecohen@portblakely.com									
BVC: Lorisa Love-lorisa.love@us.bureauveritas.com									

Clause	Audit Report
Opening Meeting	<p>Participants: Eric Cohen, Chris Whitson, Zach Carras, Stacy Krum, Jessica Weigel, Mike Warjone, Chris Lunde, Jerry Bailey, Orv Mowry, Jeff Geer, Dennis Muller, Chris Lacey, Ryan Parker, Jake Sullivan, Josh Meek, Bonny Glendenning, Garth Waugh, Devan Powell, Claudine Reynolds, Sara Rise, Michelle Buenzli</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 nonconformances - 0. ➤ Process approach to auditing and audit sampling ➤ Confidentiality agreement ➤ Termination of the audit ➤ Appeals process ➤ Closing meeting timing
Closing Meeting	<p>Participants: Eric Cohen, Chris Whitson, Zach Carras, Stacy Krum, Jessica Weigel, Mike Warjone, Chris Lunde, Jerry Bailey, Orve Mowry, Jeff Geer, Dennis Muller, Jake Sullivan, Bonny Glendenning, Garth Waugh, Claudine Reynolds, Sara Rise, Leif Hansen, Catherine Weis, Dave Roberts</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 ➤ Nonconformances - 0 ➤ Date for next audit. ➤ Reporting protocol and timing