BVQi

Washington State Department of Natural Resources

Certification Report
Sustainable Forestry Initiative® Standard
SFI 2002-2004 Edition

Prepared for:

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March 15, 2005

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Certification Report
Sustainable Forestry Initiative® Standard

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Executive Summary

During August 30-September 2 and September 13-16, 2004, BVQi NA, of Jamestown, New York conducted a certification audit to the 2002-2004 Sustainable Forestry Initiative® (SFI) standards for the Washington State Department of Natural Resources (DNR) western Washington lands. Vincent Corrao, Jack Ward, and Del Ferguson conducted the certification audit. Mr. Corrao was the lead auditor, and Messrs. Ward and Ferguson were audit team members. The audit team included three technical experts, Carl Yee Ph.D., RFP, Phil Peterson, and Tom O'Neil. Ms. Peggy Murphy, DNR SFI Project Coordinator for the DNR provided audit planning and logistical support that contributed to successful execution of the audit.

A pre-certification planning audit was conducted September 29-October 2, 2003, conducting a complete document review. The finding of the pre-certification planning audit was reported separately on October 2, 2003.

Three non-conformances were issued during the certification audit. Several opportunities for improvement and notable practices were communicated to the DNR and included in this report.

With the completion of this report, the two SFI audit objectives were attained. Both the pre-certification planning audit and certification audit were conducted in a positive atmosphere. The findings and conclusions of this certification audit are the results of a constructive and cooperative effort between DNR and BVQi.

Since all non-conformances issued during the certification audit were cleared and approved by BVQi, BVQi recommended that the Washington DNR be awarded conditional certification at the closing meeting on September 16, 2004. On March 15, 2005 the DNR implemented the corrective and preventative actions necessary and were approved by BVQi. The non-conformances were closed and BVQi recommends immediate certificate award.

The contents of this report are strictly confidential and the property of DNR. BVQi will not distribute this information without written permission from DNR.

Audit Scope Summary

Contract Number: **HQ11205**

Audit Team: **Auditors: Vincent Corrao, EMS-LA, CF®**
                                 Jack Ward, EMA-LA, CF®
                                 Del Ferguson, EMS-A, P.Geo., FGAC, Dip.ForEng

           Technical Experts: **Carlton Yee, Ph.D., RFP**
                                 Tom O'Neil
                                 Phil Peterson

Country: **United States of America**

States: **Washington**

Total Land Base: **Western Washington, approximately 1,300,000**

Audit Dates: **August 30-September 2 & September 13-16, 2004**

Audit Recommendation: **Immediate Certification**

**Date of Completion of
Corrective Actions:**   **March 15, 2005**

Duration of Certificate: **Three (3) Years**

SECTION 1.0

AUDIT BACKGROUND

1.1 Introduction

During August 30-September 3 and September 13-16, 2004, BVQi NA, of Jamestown, New York conducted a certification audit to Objectives 1 – 7 of the 2002-2004 Sustainable Forestry Initiative® (SFI) Standard for the Washington Department of Natural Resources (DNR) lands. The scope of the audit included the forest management operations throughout their western Washington ownership. In preparation for this audit a pre-certification planning was held with DNR's SFI coordinator during September 29–October 2, 2003 to conduct a document review and plan for the certification audit. Vincent Corrao, Lead Auditor of BVQi NA, and Jack Ward conducted the pre-certification planning audit. The findings of the pre-certification planning audit were published in October 2, 2003. Vincent Corrao, Jack Ward, Del Ferguson conducted the certification audit. Mr. Corrao was the lead auditor, and Messrs. Ward and Ferguson were audit team members. Messrs Corrao and Ward are Registrar Accreditation Board EMS Lead Auditors and SAF Certified Forester and has extensive experience with best management practices, forest operations, and silviculture, and forest stewardship. Mr. Ferguson is an RAB EMS Auditor and has extensive experience in forest engineering, hydrology, geology, and forest operations.

Three regional technical resource experts were part of the team to provide specialized knowledge as advisors to BVQi auditors. Carl Yee, Ph.D., RFP provided expert knowledge in the area of forest operations and hydrology, Tom O'Neil, wildlife biologist has extensive background in biodiversity and wildlife ecology. Phil Peterson, wildlife biologist provided guidance to the team in wildlife and fisheries ecology.

Ms. Murphy, DNR's SFI Project Coordinator provided audit planning and logistical support that contributed to successful execution of the audit.

This report describes the SFI audit process undertaken by BVQi and DNR, as well as the audit findings and conclusions. The Appendices provide supporting information for the findings and conclusions identified in this audit report. Appendix I includes the SFI Standard Compliance Matrices (SF61) for all BVQi auditors and technical experts. These reports identify the verification indicators applied by DNR and the documented evidence used to demonstrate conformance during the audit, and the auditor comments and findings for each performance measure and verification indicator. Appendix II contains the SFI Interim Report (SF63). This report provides an audit summary of the certification audit during

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August 30-September 2 and September 13-16, 2004. Appendix III contains the Nonconformity Reports (SF02) that were issued. Appendix IV contains the biographies for the audit team members. Appendix V contains the Audit Schedule Cover Sheet. Appendix VI contains the DNR certification audit plans.

1.2 Scope and Objectives of the Audit

The certification audit was conducted within DNR's operations during the week of August 30-September 2 and September 13-16, 2004. The audit included the DNR's forest management system for lands in western Washington. The DNR's forest management system is guided by the Forest Practices Act, and the DNR's Habitat Conservation Plan, Forest Resource Plan, and Sustainable Forestry documents. The field verification covered Objectives 1-7 of the SFI Edition 2002-2004.

The scope of the audit included:

> "Washington State DNR's forest management operations in western Washington."

The audit plans ensured that all Verification Indicators were covered. As provided in the SFI 2002-2004 Edition standard, the two audit objectives adopted were to:

1. Establish conformance of the DNR's Program against the SFI Standard (SFI 2002-2004) and any additional criteria and indicators; and
2. Establish whether the DNR's sustainable forestry management system and on-the-ground activities meet the SFI Standard Objectives and Performance Measures.

1.3 Audit Protocols

This SFI certification audit was conducted under environmental auditing methodologies identified in the SFI 2002-2004 Verification/Certification Principles and Procedures document (SFI-V/CPP). Standard BVQi protocols and forms were applied throughout the verification as provided by the BVQi NA SFI Auditor Handbook.

1.4 Definition and Application of Non-conformances, Notable Practices, and Opportunity for Improvement

Verification should be considered a positive process, with auditors reviewing documents and procedures for conformance. Where it is identified that objective evidence does not demonstrate conformance with

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one or more of the SFI performance measures or fails to address a core indicator of the SFI Standard, a non-conformity report will be issued by the audit team. The standard BVQi SF02 Non-conformity Report (NCR) is used to record all non-conformances.

An NCR may only be raised against the SFI performance measure where there is sufficient evidence to indicate a program weakness that is likely to result in a negative environmental impact, or if an SFI program requirement is not effectively implemented. NCR's are graded as minor or major. In assessing intent, implementation, and effectiveness of an SFI program, a minor non-conformance indicates a SFI program weakness or a lack of objective evidence of effective implementation. A major non-conformance indicates a high potential for a program failure, or that an SFI program requirement has not been addressed or implemented. Normally an NCR is raised for each case where evidence does not demonstrate conformance. However, a persistent weakness may be grouped as a single NCR and graded as a major, indicating a system-wide weakness.

NCR's may be raised when objective evidence indicates that a policy, program, plan, or procedure fails to comply with the full requirements of an SFI performance measure or core indicator; if a policy, program, plan, or procedure has not been effectively implemented; or an operational observation indicates failure to achieve regulatory or voluntary requirements (for example a BMP). Nonconformity Reports are linked directly to the SFI performance measure and verification indicator in the issuing auditor's SF61 SFI Standard Compliance Matrix. The NCR will state the objective evidence for issuing the NCR and the specific requirement of the SFI performance measure, verification indicator, or the program participant's internal requirement that is not supported.

BVQi auditors shall identify opportunities for improvement and notable practices during an SFI audit. These shall be recorded in the SF61 SFI Compliance Matrix and SF63 Interim Reports.

- An opportunity for improvement is defined as a potential system weakness that could lead to a nonconformance in the future if not adequately addressed by the auditee.
- A notable practice is defined as system strengths that BVQi considers exemplary.

1.5 Audit Recommendations

After completion of the certification audit, standard practice requires the audit team to provide a recommendation in consideration of the audit results. Based on the presence or absence of non-conformances, a positive, conditional, or negative recommendation is made.

A *positive decision* leads to a recommendation for immediate certification. A positive decision may only be given in the cases where no non-conformances are presented by the audit team during the verification, or in the cases where any non-conformances presented are dealt with to the satisfaction of the Lead Auditor so that he/she may approve corrective actions *prior* to the end of the verification audit itself.

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A *conditional decision* will be made if there are outstanding non-conformances that require corrective actions. The condition decision is further subdivided by the severity of the outstanding non-conformances. Where outstanding non-conformances are *unlikely* to threaten program integrity a conditional recommendation is given without the need to revisit the program participant, i.e. the implementation of outstanding non-conformances may be approved by the Lead Auditor through review of an updated procedure, training record or policy statement. However, where non-conformances are of a nature that may lead to program failure or where substantial BMP non-compliance is observed, a conditional decision may require a follow-up visit to verify the effectiveness of the proposed corrective action plan.

A *negative decision* is made if the audit team believes that the program is so weak and that outstanding non-conformances are of such a nature that the program participant could not achieve conformity with the SFIS. In these cases the program participant will require reverification of its program at a later date. It is the purpose of the pre-certification planning audit process to ensure that the program is robust enough to proceed to the certification audit.

Certificates may be released once the program participant has implemented corrective actions to all non-conformances to the satisfaction of the Lead Auditor. Certificates are dated the day that the final non-conformance has cleared (corrective actions have been approved by the auditor) or the final date of the closing meeting of the certification audit if no non-conformances are raised. For this certification audit a conditional recommendation was made based on a major non-conformance being issued to Objective 9. The DNR can not receive a certificate until it becomes an SFI licensee. The DNR completed the corrective action for the major non-conformance on March 15, 2005. Additionally, two minor non-conformance corrective action plans were accepted and have been implemented to the satisfaction of the Lead Auditor. See Appendix III for the issued non-conformances.

1.6   Verification Process

1.6.1 Audit Planning

Audit planning began with a request by the Lead Auditor to have DNR complete an SFI Standard Compliance Matrix (SF61) as provided in Appendix I, documenting its policies, programs, plans, and procedures that demonstrated conformance to the verification indicators that defined DNR's SFI Program. DNR documentation was reviewed during the pre-certification planning audit, completed in October 2, 2003. Based on this review, BVQi recommended that the DNR and BVQi proceed with the certification audit.

One goal of the pre-certification planning audit was to develop the certification audit plan. On July 27-28 2004 at a meeting with the DNR, a lists of all forest management activities occurring on lands managed by the DNR since September 1, 2003 was reviewed by the Lead Auditor. The DNR categorized each site

by several risk factors. Criteria used by BVQi to select sites included, 1) forest management operations, 2) environmental risk, and 3) richness of the tract. Sites were also chosen that represented, 4) typical forest management practices, and 5) unique/special management sites. Forest management operations provided for selecting sites that covered a range of silvicultural and post-harvest activities, forest management prescriptions, and road construction/maintenance. Environmental risk provided for covering sites associated with potential impacts on water quality, riparian/wetland impacts, and soil productivity. Richness provided the greatest opportunity to verify several performance measures at each site. The Lead Auditor selected approximately 100 sites of operational activities and harvest areas that had been active since September 2003 and attempted to include sites for all Districts within each Region. Many sites were very close in proximity and allowed a large variety of activities to be seen. Additionally, special/unique management sites and active harvest sites were included to ensure an efficient audit plan. The final list of selected sites provided for a certification audit that:

1. ensured that all applicable Performance Measures and Core Indicators were demonstrated;
2. ensured that, as far as possible, compliance with environmental regulations, codes of practice and BMPs were illustrated;
3. ensured that, as far as possible, all activities within the scope of registration and of relevance to SFI were reviewed; and
4. ensured that the DNR effectively implemented its SFI program to achieve conformance with the SFIS.

1.6.2 Conducting the Audit
Prior to conducting the certification audit the final audit plan was approved by DNR and BVQi. The DNR certification audit plans are provided in Appendix VI. DNR provided logistical support and appropriate staff to accompany the auditors at all times.

An opening meeting was conducted August 30, 2004 at the Pacific Cascade Region Office in Castle Rock via conference call with the Northwest Region office in Sedro Woolley. This meeting was attended by BVQi lead auditor Vincent Corrao, auditor Jack Ward, and auditor Del Ferguson. Technical experts were also present and included wildlife ecology expert Tom O'Neil, forest operations and hydrology expert Carlton Yee, Ph.D., and wildlife and fisheries expert Phil Peterson. The opening meeting was attended by fifteen DNR personnel including Peggy Murphy, SFI Project Coordinator, Craig Partridge, Policy Director, Vicki Christiansen, Pacific Cascade Region Manager, Bill Wallace, Northwest Region Manager, Candace Johnson, Assistant Region Manager Northwest, Jim Hotvedt, Assistant Region Manager Pacific Cascade, Brenda Galarza, Project Coordinator, Noel Wolff, Region Hydrologist, Jeff May, Baker District Manager, Laurie Bergvall, Cascade District Manager, Peter McBride, Northwest Region Biologist, Allen Estep, Biologist, Stephanie Zurenko, Geologist, and DNR Foresters Colin Robertson and Kevin Killian.

The audit scope and certification audit schedules were reviewed and discussed to efficiently travel to all field sites. The DNR staff from each office and the audit teams introduced themselves and described their positions and functions for supporting the audit. Discussions included audit procedures and the activities that would be audited, and how they relate to the SFI Standard. Questions concerning the audit were discussed with the audit team. A question and answer period discussing the information supplied in the auditor packs and the field packets for the field portion of the audit was also conducted.

Potential non-conformances and the requirements for clearing them were discussed. Opportunities for potential improvement were also discussed in light of how they may affect conformance in the future. Notable practices were also discussed and that all findings would be communicated each evening with Peggy Murphy, SFI Coordinator.

BVQi was impressed with how well prepared the Washington State Department of Natural Resources was for conducting the field portion of the audit. The field packets were well prepared for each of the sites selected and each auditor received their auditor pack the week previous to the audit.

The four Regions within the western part of the state were visited during the certification audit. During the two-week period every effort was made to visit all the Districts within each Region and to audit management activities conducted by the DNR. Active harvest operations and other management activities were frequently added to the audit schedule as the teams moved from site to site throughout the Regions. The audit teams visited 125 sites during the certification audit. The field verification covered Objectives 1-7 of the SFI Edition 2002-2004.

DNR personnel that were interviewed during the field audit included:

Pacific Cascade Region-Jim Hotvedt, Assistant Region Manager, Colin Robertson, St. Helens District, Dean Adams, Pacific District, Jim Lejeune and Steve Teitzel, Forester Capitol Forest, Bud Sargent,

Silviculture Forester, Allen Estep, Biologist, Dale Kysar and Alex Nagygyor, Engineer Lewis District, Ron Schuttie, Assistant Regional Manager.
South Puget Sound Region-Brian Ballard, King District, Bob Brown and Ted Keeley, Rainier District, Joe Brady and Phil Wolf, Hood Canal District.

Northwest Region-Bill Wallace, Northwest Region Manager, Kevin Killian and Jeff May, Baker District, Laurie Bergvall and Peter Hurd, Cascade District, and Noel Wolff, Gary Dickman and Bea Robson, Foresters.

Olympic Region-Charlie Cortelyou, Regional Manager, Al Vaughn, Assistant Region Manager, Dave Christiansen, Program Silviculture, Bill Wells and Brian Turner, Coast District, Scott Horton, Biologist,

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Mike Potter, Christopher Eades and Mike Cronin, Crescent District, Gary McLaughlin, Geologist, and Cindy Tonasket, Forester.

The closing meeting was held September 16, 2004 at the Olympia office via a conference call with the Regional offices and management staff of the DNR. The closing meeting was attended by Peggy Murphy, SFI Project Coordinator, Craig Partridge, Policy Director, Gretchen Nicholas, Division Manager, Bill Wallace, Northwest Region Manager, Vicki Christiansen, Pacific Cascade Region Manager, Jim Hotvedt, Assistant Region Manager Pacific Cascade, Charlie Cortelyou, Olympic Region Manager, Bruce Mackey, Lands Steward Manager, and Eric Schroff, South Puget Sound Region Manager.

SECTION 2.0

AUDIT RESULTS

2.1   General Findings

This report summarizes the certification audit activities and results. Auditor comments and specific findings and observations for each of the SFI verification indicators are recorded on the SF61 Standard Compliance Matrices in Appendix I.

The audit was conducted in a positive manner. Representatives of DNR were very cooperative throughout the audit process and demonstrated an excellent knowledge of their forestry program. DNR employees approached all non-conformances and opportunities for improvement in a positive manner, demonstrating a willingness to improve their forest management system. BVQi auditors were impressed with the on-the-ground application of the DNR's SFI program. In addition, technical experts accompanying BVQi auditors also commented on the excellence of the DNR's forestry program. All DNR personnel who were interviewed during the audit are included within the SF61 Standard Compliance Matrices in Appendix I.

The closing meeting was held on September 16, 2004 with a recommendation for conditional certification.

2.2 Non-conformances Issued

One major non-conformance and two minor non-conformances (SF02 Nonconformity Reports) were issued during the certification audit. The SF02 Nonconformity Reports with corrective actions are provided in Appendix III and referenced in the auditor's comments within the SF61 Standard Compliance Matrices. The DNR has implemented corrective and preventative action and has been approved by BVQi. BVQi recommends the DNR for immediate certification.

Listed below are the three non-conformances issued. The audit findings and corrective actions approved by the issuing auditor have been included. The SF02's are identified by a number that begins with CA (certification audit), and the auditor's initials; VC (Vincent Corrao) or DF (Del Ferguson), followed by a sequential number.

CA-VC-01
Requirement: SFI-Objective 9, P.M. - 4.3.1.1.1: Program Participants shall report annually to the SFI program on their compliance with the SFIS.

Finding: Objective 9, P.M. - 4.3.1.1.1: The WA DNR has not joined the AF&PA or become a SFI licensee and has not provided the annual progress reports and the SFI survey questionnaire in reporting their commitment to sustainable forestry.

Corrective Action: The Washington DNR is not a member of AF&PA or SFI licensee. After the DNR joins as an SFI member, the DNR will submit the required reporting documents by March 2006.

CA-VC-02
Requirement: SFI-Objective 3, P.M. - 4.1.3.1.4 - CI 1: Written policy to train those employees and operators responsible for implementing BMPs to protect water quality.

Finding: Objective 3, P.M. - 4.1.3.1.4. - CI 1: An established written policy or guideline encouraging the use of trained loggers has not been developed or implemented.

Corrective Action: When the Department of Natural Resources becomes a licensee of the Sustainable Forestry Initiative, the following will occur within six months. The Department of Natural Resources will publish a statement on the DNR website and/or on timber sale auction announcements that the Department, as a SFI licensee, encourages loggers to be trained in sustainable forest management techniques and/or best forest management practices.

CA-DF-03
Requirement: SFI-Objective 3, P.M.-4.1.3.1.4- CI 2: BMP training sessions for employees are required and documented and similar sessions are encouraged and documented for contractors.

Finding: Objective 3, P.M.-4.1.3.1.4- CI 2: There is a lack of requiring or encouraging logger education and training. Logger training documentation is not conducted to insure that training has occurred and is current and if it meets the State Implementation Committee logger training requirements.

Corrective Action: The Department will encourage logging contractors to have a trained logger on site during harvest operations. Furthermore, the Department requests that timber contract purchasers submit training documentation, if available, to the region office for the loggers that the purchaser employs on the Department harvest site. Similar encouragement is extended to contract logging operations on Department-managed forestlands.

2.3   Opportunities for Improvement

BVQi auditors observed several opportunities for improvement. DNR was informed that these need to be considered in light of how they may affect conformance during future audits.

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OFI-Objective 1, P.M. - 4.1.1.1.1 - CI 2: Full utilization of an efficient GIS system as described in the Forest Resource Plan, Policy # 16 (p.31) could be implemented across the regions.

OFI-Objective 2, P.M. - 4.1.2.1.5 - CI 2: The Timber Sale Inspection Reports could be improved by adding checks for fire preparedness, compliance with the HCP and SEPA, and standardization of checklist throughout the Regions.
OFI-Objective 2, P.M. - 4.1.2.1.3 - CI 2: Consider monitoring procedures to document the chemical use rate.

OFI-Objective 3, P.M. - 4.1.3.1.1 - CI 3: The Forest Practices Division inspects the DNR operations but does not document inspections unless non-compliance is found. Tracking and Planning and HCP monitoring process are in progress but results are generally 12 to 18 months behind the activity before personnel on the ground review results. Continual improvement is one of the six principles of the SFI Standard and continual monitoring by the DNR staff during the implementation of activities provides opportunity to monitor corrective actions and improvements during the activity where environmental risk is the highest.

OFI- Objective 4, P.M.-4.1.4.1.1-CI 1: Enhance guidelines to promote biological diversity.

OFI-Objective 7, P.M.-4.1.7.1.1: Evidence of poor utilization in a few units in the Northwest Region on one District included long butts, chunks, logs and high stumps was observed on multiple sites and significant silvicultural potential has been compromised by large accumulations of landing slash.

2.4 Notable Practices

BVQi auditors found several practices they considered to be notable. These represent SFI program strengths that BVQi found to be exemplary practices.

NP-Objective 1, P.M.-4.1.1.1.3: On the Tahuya State Forest an ORV trail sediment study was conducted in 1993 and found that riparian areas along the ORV trails needed to be hardened to reduce sediment to water courses. These areas have been completed and monitoring is being implemented with a counting and capacity plan for the area.

NP-Objective 2, P.M.-4.1.2.1.1: The DNR's successful efforts in combining ground applications and aerial applications of herbicides to establishing free-to-grow plantations is notable in locations with numerous leave trees and small unit size. DNR's outreach efforts have been successful with local community groups.

NP-Objective 2, P.M.-4.1.2.1.4-CI 8: Several examples of excellent road abandonment procedures were observed in the field and a significant reduction in road mileage has occurred during the past ten years.

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Road layout, spacing, positioning for harvesting system's maximum performance was observed on every site visited. Ongoing, day-to-day maintenance is excellent at all sites visited and travel to these sites. Usage of crushed rock to cap roads is effective in reducing rock usage by an estimated 25%. RMAP program is well conceived and executed. Progress has been excellent. Examples are Sherman Creek streamside road removal and CID paving. E-line removal will also be an excellent example of how this program works. Both are on the Capitol Forest, but other districts also had notable results.

NP- Objective 3, P.M.-4.1.3.1.4: Cross-training between the DNR and Forest Practices Act staff does occur and allows the participants to gain insight as to what the process and compliance issues and concerns are from different perspectives.

NP-Objective 3, P.M.-4.1.3.1.2-CI 3: On DNR lands, there is an on-going program to replace old culverts along main roads which have a barrier to fish migration (e.g. CID, Sweet Pea, Hop to It). Efforts at these crossings are to re-establish fish connectivity across the corridor and to minimize sedimentation into the stream using armoring, grass-seeding and sometimes paving.

NP-Objective 3, P.M.-4.1.3.1.2-CI-3: On the Outskirt Timber Sale the riparian buffers were very well implemented throughout the area. The riparian buffers begin at the edge of the 100 year flood plain and extent upwards to 200 plus feet in width depending on the site index of the area. This exceeds Washington FPA requirements and is implemented very well to meet the HCP requirements.

NP-Objective 4, P.M.-4.1.4.1.3-CI-1: The spotted owl circles and the marbled murrelet known and long term habitats are well documented in the Pacific Cascade Region have been reclassified as new habitat information becomes available. Biologist and resource personnel work closely to insure adequate protections are implemented. The Olympic Region demonstrated application excellent GIS utilization.

NP-Objective 5, P.M.-4.1.5.1.1-CI-2: Visual management landscape techniques were well used and wide spread throughout the DNR operations.

SECTION 3.0

CONCLUSION

With this report, the two SFI audit objectives were attained. The findings and conclusions of this certification audit are the results of a constructive and cooperative effort between DNR and BVQi.

This report represents a snap shot in time of DNR's SFI program and provides for a baseline from which to continuously improve. Demonstrating continuous improvement is one of the six Principles for Sustainable Forestry identified in the SFI standard that will be required during re-certification within the next three years.

The SFI certification process described in this report has provided for a credible SFI program verification. Although an SFI certification audit is a sampling process, BVQi is confident that any credible auditing organization would make similar findings and conclusions.

BVQi recommended that DNR be awarded immediate certification on March 15, 2005. This certificate will be effective for a period of three years.

The contents of this report are strictly confidential and the property of DNR. BVQi will not distribute this information without written permission from DNR.