

FSC™ CERTIFICATION SYSTEM

FOREST MANAGEMENT CERTIFICATION SURVEILLANCE AUDIT n°2 Public Report

Report finalisation date: 02 January 2020

**Washington State Department of Natural Resources:
South Puget HCP Planning Unit**

*Contact Person: Douglas Kennedy, Forest Certification Program Manager
(Douglas.Kennedy@dnr.wa.gov)*

Forest location(s): USA, Washington

Certificate registration code: BV-FM/COC-080501

Date of issue: May 14, 2018

Date of expiry: May 13, 2023

Main Evaluation :	31 October 2017
Surveillance 1	8-11 October 2018
Surveillance 2	15-17 October 2019
Surveillance 3	Day Month Year
Surveillance 4	Day Month Year

BUREAU VERITAS CERTIFICATION

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FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

CONTENT

- 1 - Description and background of the applicant forest entity4**
 - 1.1 - General description and identification.....4
- 2 - Scope of certificate5**
 - 2.1 - Certification application type and description of FMU(s)5
 - 2.2 - Product categories and main commercial timber:.....6
- 3 - Description of evaluation7**
 - 3.1 - Composition of the audit team7
 - 3.2 - Description of the audit program.....8
 - 3.3 - Interview and stakeholders input and treatment.....9
 - 3.4 - Other evaluation techniques9
- 4 - Update about any changes to the scope of the certificate9**
 - 4.1 - If changes about legal and administrative context.....9
 - 4.2 - If changes about forest composition (eg. Added FMUs).....10
 - 4.3 - Number of accidents in forest work (serious/fatal) since the last audit.....10
- 5 - Standard10**
- 6 - Observation.....11**
 - 6.1 - Documents review.....11
 - 6.2 - Evaluation results with reference to the FSC referential / standard which have to be evaluated in surveillance audit.....11
 - 6.3 - Result regarding the correction of Non-Conformities (NC).....12
 - 6.4 - Result regarding the resolution of complaints.....13
 - 6.5 - Result regarding previous observations13
- 7 - Result of surveillance evaluations15**
 - 7.1 - Synthesis on the conduct of the audit and closing meeting.....16
- 8 - Records of Non-Conformities and observations and new ones raised during the audit16**
 - 8.1 - Records of Non-Conformities.....17
 - 8.2 - Records of observations17
- 9 - Proposals regarding the certification decision18**
 - 9.1 - Proposal of conclusion on whether the candidate entity achieved or not the required level of conformance18
- 10 - Certification decision18**
- 11 - Appendices19**

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

1 - Description and background of the applicant forest entity

1.1 - General description and identification

Forest Management company			
Name	Washington State Department of Natural Resources		
Address	1111 Washington St. SE, MS 47014 Olympia, WA 98504-7016		
Telephone	360-902-1283		
E-mail	Douglas.kennedy@dnr.wa.gov		
Web site	www.dnr.wa.gov		
President/Manager of the entity company	Hilary Franz		
Contact person (responsible) for FSC certification	Douglas Kennedy		
FSC trademark responsible	Douglas Kennedy		
Activity	forest management only		
Annual turnover:	\$ 23,117,579.48 USD		
Category of forest management	Natural Forest		
Number of forest workers (including contractors):	Forest field activity	148 (male)	43 (female)
	Administrative/office activity	29 (male)	30 (female)
	Industrial and transformation process (if relevant)	Number (male)	Number (female)

The Washington State Department of Natural Resources (Washington DNR, DNR, Agency or Department) manages state forest lands for a variety of public trusts which fund state-wide school construction, universities, state institutions, and county services. Forest management is directed by the Policy for Sustainable Forests (PSF), and DNR's Habitat Conservation Plan (HCP), which is a contractual agreement with the Federal Services (United States Fish & Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA)) to provide conservation benefits to threatened and endangered species within the range of the northern spotted owl, which include DNR-managed forested state trust lands within the western part of the State as well as lands on the east slopes of the Cascade Range.

The Department carries out the planning and implementation of forest management activities through a hierarchy of planning processes. Forest operations (e.g. harvest, renewal, tending) are carried out by contractors. Almost one hundred percent of timber sales are awarded through a competitive bidding process, with a portion being directly contracted to local (usually) smaller contractors. Contractors must meet specific qualification criteria for training and performance. Washington State has one of the strictest Forest Practices Acts in the United States, which dictates how forestry activities can be carried out.

2 - Scope of Certificate

2.1 - Certification application type and description of FMU(s)

2.1.1 - Certificate

	Single FMU	Multiple FMU	Group
Normal Certificate	YES		
Small SLIMF Certificate			
Low intensity SLIMF Certificate			

2.1.2 - Description of FMUs

Classification	Number of FMUs	Total forest area (ha ¹)			
		Privately managed	State managed	Community managed	Total
Less than 100 ha in area					
100 – 1000 ha in area					
1000 – 10 000 ha in area					
More than 10 000 ha	1		71,291 (176,160 acres)		71,291 (176,160 acres) ²
Meeting the eligibility criteria as SLIMF					
TOTAL			71,291 (176,160 acres)		71,291 (176,160 acres)

² – DNR requested an excision of 47 acres (19.0 hectares) to the certified area in August 2019. A description of the excision approval process is in 4.2. Washington DNR made application to Bureau Veritas (certifying body), in August 2019, to excise a total of 416.5 acres (168.6 hectares) from the certified Forest Management Unit (FMU). The proposed excised area includes 47 acres (19 hectares) of managed forest area and the remaining 369.5 acres (149.5 hectares) comprised of 9 facilities: offices, a seed orchard, nursery, and work area.

¹ 1 inch = 2,54 centimeters ; 1 foot = 0,3048 meters ; 1 yard = 0,9144 meters and 1 mile = 1,609344 kilometers

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

2.2 - Product categories and main commercial timber:

List of Timber Product Categories available for sale as FSC-certified products				
Trade Name	Species (botanical name)	Product Type/ Nature (round wood, pulpwood,...)	Selling mode	FSC product claim
Round wood logs	Thuja plicata Callitropsis nootkatensis Tsuga mertensiana Tsuga heterophylla Pseudotsuga menziesii Abies grandis Abies procera Abies amabilis Pinus contorta Pinus monticola Picea engelmannii Picea sitchensis Taxus brevifolia Alnus rubra Fraxinus latifolia Betula papyrifera Prunus emarginata Populus trichocarpa Crataegus douglasii Arbutus menziesii Acer glabrum Acer macrophyllum Quercus garryana Salix species	Round wood logs W1.1	FOB	FSC 100%
Other non-timber forest products	<u>Boughs:</u> Thuja plicata Pinus monticola Abies grandis Abies procera Pseudotsuga menziesii <u>Brush:</u> Vaccinium ovatum Vaccinium parvifolium Gaultheria shallon Polystichum munitum Rhamnus purshiana	Conifer boughs, brush N10	FOB	FSC 100%

The Department sells roundwood logs either on the stump or harvested under contract, with the vast majority being stumpage sales. The primary species include: Douglas Fir (Pseudotsuga menziesii), Western Red Cedar (Thuja plicata), Western Hemlock (Tsuga heterophylla), Pacific Silver Fir (Abies amabilis), Noble Fir (Abies procera) and Red Alder (Alnus rubra). DNR also sells the harvest rights for conifer boughs and brush from a variety of tree and shrub species but does not market these products with FSC claims.

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Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

3 - Description of evaluation

3.1 - Composition of the audit team

Evaluation Team (main assement)	Notes and CV (<i>put CV in appendices and sum up the notes from previous audits</i>) of team member	MA (<i>fulfill with cross in the relevant column</i>)	AS1	AS2	AS3	AS4
Team Leader	Brian Callaghan	X				
Auditor 1	Sarah Bros	X	X	X		
Auditor 2	Craig Howard	X				
Auditor 3	Jim Colla		X			
Local Specialist (Forester and ecologist)						
Local Specialist (social)						
Trainer						
Peer Reviewers	Notes					
Peer Reviewer 1						
Peer Reviewer 2						

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

3.2 - Description of the audit program.

3.2.1 - Surveillance audit schedule and last survey audit schedule

SURVEILLANCE n° SV2 AUDIT SCHEDULE			
Team	Time	Detailed visited sites	Check point, Field assessment activity and justification of the selection of the points monitored and on-sites visits performed
Tuesday, October 15th, 2019 Washington DNR			
Bros	8:30 am	Washington DNR office, Olympia	Opening meeting of the audit in presence of Douglas Kennedy, Hannah Yourd
Bros	9:00 am	Washington DNR office, Olympia	Document review/stakeholder interviews/finalize site visits/DNR presentations
Bros	16:30 pm	Washington DNR office, Olympia	Daily debrief
Wednesday, October 16th, 2019 Washington DNR			
Bros	7:00 am	Gather at DNR office, Olympia	Field visits to Elbe Planning Unit
Bros	7:30 am	Depart for field and rally point	
Bros	9:00 am	Gather at Pierce Co. station	Review day's objectives, schedule and activities. Depart for site visits
Bros	18:00 pm	DNR office	Daily debrief
Thursday, October 17th, 2019 Washington DNR			
Bros	7:00 am	Gather at DNR office, Olympia	Site visit to seed orchard
Bros	10:30 am	Meridian Seed Orchard	View seed orchard activities
Bros	11:00 am	DNR office, Olympia	Document review and interviews/ compile findings
Bros	15:00 pm	Closing Meeting	Closing meeting Present findings to Douglas Kennedy, Hannah Yourd, discuss next steps, confidentiality and appeals

Statement of the total person days spent for assessment:

activity	Nb of man/day
Pre-evaluation or preparatory work	0.5
Audit activity on field	3
Stakeholder consultation	0.5
Report writing	2
TOTAL	6

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

3.2.2 - Clear description of the sampling system employed to select FMUs or sites for evaluation and RATIONALE for their selection

During the audit 10 sites covering a range of activities were selected for visit by the auditors. Sites visited, and activities observed included, but were not limited to, active harvest, regenerated units, wetland and riparian reserve management zones, commercial harvests, public activities, wildlife management zones, Endangered Species Act conformance, road infrastructure, and one of the areas being excised. The table below highlights the activities observed at the sites visited, and discussions during the audit.

Date	Auditor	Site No.	Comments
16-Oct	Bros	Elbe - Forgotten Top (63 ac/25 ha)	Variable density thinning 2016; research & monitoring for flying squirrel habitat; on site observations of flying squirrel boxes and harvest thinnings; discussion on research establishment, objectives and monitoring results
16-Oct	Bros	Elbe - Round Top (41 ac/17 ha)	continued discussion on research work; 2015 VRH; 2016 plant; scheduled for 2019 stocking survey; discussion on future treatments
16-Oct	Bros	Elbe - Nisqually (235 ac/95 ha)	viewed 2019 VRH, VDT and RMZ; observed active road construction; interviewed road construction crew; discussion of regeneration prescription; observed adjacent regeneration; discussion on harvest objectives for block
16-Oct	Bros	Elbe - Sunbeam (71 ac/29 ha)	observed regeneration and hand cut thinning 2018; discussion on success of regeneration
16-Oct	Bros	culvert	drainage culvert; discussion on how/who decides when and where to install drainage culverts; discussion on monitoring
16-Oct	Bros	bridge	discussion on bridge inspections, lifespan of bridge, safety requirements on public roads
16-Oct	Bros	Elbe - Park Bench (146 ac/59 ha)	recent 2019 VDT; discussion of utilization issues with contractor; observed mitigation/restoration of road ROW trespass into riparian area
16-Oct	Bros	Elbe - Benny Beaver (55 ac/22 ha)	VRH 2017; viewed 2019 SIP; scheduled for plant 2020; discussion on prescription and need for veg management; observed adjacent block competition (10 year old plantation)
16-Oct	Bros	Elbe - Decommissioned shooting pit (1.5 ac/0.6 ha)	observed decommissioned rock pit; discussion re: safety hazard and need to close shooting range/decommission rock pit;
17-Oct	Bros	Seed Orchard - proposed excision	observed seed orchard; discussion regarding the rationale for excising seed orchard from FSC certified forest

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

3.3 - Interview and stakeholders' input and treatment.

3.3.1 - Interview(s) of involved people met during audit.

Involved people (contracted by the company)			MA	AS1	AS2	AS3	AS4
category	name	Position					
Owner							
Manager							
Employee(s):	Douglas Kennedy	Forest Certification Program Lead	X	X	X		
	Hannah Yourd	Forest Certification Specialist	X	X	X		
	Andy Hayes	Division Manager	X				
	Allen Estep	Assistant Division Manager - HCP and Scientific Consultation	X	X	X		
	David Bergvall	Assistant Division Manager - Forest Informatics & Planning	X				
	Calvin Ohlson-Kiehn	Assistant Division Manager - Silviculture	X	X	X		
	Kristen Ohlson-Kiehn	Assistant Division Manager - Planning	X		X		
	Mike Buffo	Environmental Planner	X				
	Sara Palmer	State Lands Archeologist	X	X	X		
	Darin Cramer	Division Manager - Product Sales & Leasing	X				
	Koshare Eagle	Assistant Division Manager - Product Sales		X			
	Brock Milliern	Division Manager - Conservation, Recreation, and Transactions	X				
	John Gamon	Assistant Division Manager - Natural Areas/Natural Heritage	X				
	Tim Stapleton	Assistant Division Manager - Recreation	X				
	Alex Nagyagyor	Assistant Division Manager - Engineering Division - Roads Section	X				
	Jeff Ricklefs	Forest Inventory Program – Forest Resources Division		X			
	Scott Sargent	South Puget Sound Region Manager	X	X			
	Dean Adams	State Lands Assistant Region Manager - Product sales, Land management, Engineering	X	X			
	Laurie Benson	Assistant Region Manager - Asset management, Recreation, Natural Areas	X	X			
	Brian Williams	Intensive Management Forester - South Puget Sound Region	X	X			
	Dave Gufler	Intensive Management Forester - South Puget Sound Region	X				
	Alan Mainwaring	Wildlife Biologist - South Puget Sound Region	X	X	X		
	Keith Yonaka	South Puget Sound Region Engineer	X	X			
	Kara Huntsmen	Intensive Management Forester			X		
	Ted Keeley	District Manager - Rainier District	X				
	Lee Roach	District Manager -Rainier District	X	X	X		
	Joe Chavez	Recreation Manager - Rainier District		X	X		
	Brandon Mohler	Forest Manager - Elbe Unit	X				

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

	Nancy Barker	Recreation Manager - Elbe Unit	X				
	Michelle Bell	Engineer - Elbe Unit	X		X		
	Andrew Reed	Unit Forester – Elbe Unit		X			
	Kevin Carlsen	Forester - Elbe Unit	X	X	X		
	Mike Fowler	Forester - Elbe Unit	X		X		
	Craig Higbee	Forester - Elbe Unit	X				
	Andy Aschenbrenner	District Manager - Hood Canal District		X			
	Nathan McReynolds	Forest Manager - Belfair Unit	X	X			
	Katie Woolsey	Natural Areas Manager		X			
	Jesse Sims	Recreation Manager - Belfair and Hood Canal Units	X				
	Ray Minish	Recreation Forester - Belfair Unit	X				
	Eric Haggstrom	Recreation Manager - Belfair and Hood Canal Units		X			
	Bill Heymann	Engineer - Hood Canal District		X			
	Andy Ritter	Forest Manager - Delphi Unit	X				
	Phil Wolff	Recreation Manager - Delphi Unit	X				
	Kristen Bloomfield	Forester - Delphi Unit	X				
	Tyler Traweek	Unit Manager - Black Diamond Unit	X	X			
	Daniel Eide	Rights of way Manager - Black Diamond Unit	X	X			
	Justin Gardiner	Unit Engineer - Black Diamond Unit		X			
	Jacob Conklin	Forester – Black Diamond Unit		X			
	Jarrod Kaiser	Watershed Manager - Tacoma Water		X			
	Brian Ballard	Forester - Tacoma Water		X			
	Susan Seaberg	Engineer – Rainier District		X			
	Maureen Crabtree	Intensive Management Forester - Pacific Cascades Region - Lewis District	X				
	Jacob Oberlander	Forester - Three Corner Rock Unit	X				
	Paul Footen	Forester - Snoqualmie Unit		X			
	Sam Jarrett	Recreation Manager - Snoqualmie Unit		X			
	Eric Bauer	Engineer - Snoqualmie Unit		X			
Sub contractors:		B&M Logging - loader operator		X			
		B&M Logging - trucker		X			
		WCC crew - Supervisor		X			
		WCC crew -		X			
		Severson Road Construction crew (3)			X		

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

3.3.2 - Stakeholders identification and consultation process

Stakeholders were first identified and then consulted formally via email on October 9th, 2019, prior to the surveillance audit, then during the audit week and again within 2 weeks of the audit. Below is a record of the consultation for this surveillance audit (SV2).

3.3.3 - Record of stakeholder received comments or complaints

Stakeholders reference (name / type)	date	Received comment or complaints	Theme (social, economy, environment)	Checked on site (YES or NO)	Answer from the certificate holder	Answer from Bureau Veritas
Institutions/individuals informed about the evaluation						
NGO Conservation	Oct 9/2019	None	environmental	NO	NO	NONE REQUIRED
NGO Recreation	Oct 9/2019	None	social	NO	NO	NONE REQUIRED
NGO Settlement Partner	Oct 9/2019	None	Economical/environmental	NO	NO	NONE REQUIRED
NGO Recreation	Oct 9/2019	None	social	NO	NO	NONE REQUIRED
NGO Conservation	Oct 9/2019	None	environmental	NO	NO	NONE REQUIRED
Indigenous Peoples	Oct 9/2019	None	Indigenous	NO	NO	NONE REQUIRED
NGO Recreation	Oct 9/2019	None	social	NO	NO	NONE REQUIRED
NGO Recreation	Oct 9/2019	None	social	NO	NO	NONE REQUIRED
Individuals who were interviewed						
NGO Conservation	Nov 18/2019	None	environmental	NO	NO	NONE REQUIRED
NGO Recreation	Nov 7/2019	None	social	NO	NO	NONE REQUIRED
NGO Recreation	Nov 8/2019	None	social	NO	NO	NONE REQUIRED
NGO Recreation	Nov 4/2019	None	social	NO	NO	NONE REQUIRED
Individuals who contributed information in writing						
NONE						

3.4 - Other evaluation techniques

None.

4 - Update about any changes to the scope of the certificate

4.1 - If changes in legal and administrative, land use, ownership, use rights, HCVFs & RTE species, commercial products, forest management or timber traceability.

There have been no changes in:

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

Legal & Administrative context
Land use
Ownership and Use Rights
Forest Composition
HCVFs & RTE species
Commercial Products
Forest Management or
Timber traceability.

4.2 - If changes in forest composition (eg. Added FMUs, excisions)

Washington DNR made application to Bureau Veritas (certifying body), in August 2019, to excise a total of 416.5 acres (168.6 hectares) from the scope of its certificate. The proposed excised area includes 47 acres (19 hectares) of managed forest area and the remaining 369.5 acres (149.5 hectares) comprised of non-forest area and 9 facilities: offices, a seed orchard, nursery, and work area. Auditors considered carefully the detailed evidence and rationale provided by Washington DNR for the excision and recommended that the proposed managed forest area be excised from the certificate. The new area is reflected in Table 2.1.2 Description of FMU(s). Supporting documentation associated with the excision request is included in the Appendices to this report.

In summary, the rationale for requesting an excision from the existing FMU was primarily due to the new FSC pesticide policy (FSC-POL-30-001 V3-0) released in May 2019. Specifically, scope of the new policy is “broader” than in previous policies stating the “Policy lays out FSC’s position for managing the use of chemical pesticides in FSC-certified *management units* in consistency with Criterion 10.7 of FSC-STD-01-001 V5-2 FSC Principles and Criteria”. FSC defines a management unit as a spatially delineated area governed by a management plan with clear long-term management objectives. A management unit includes all facilities, within, outside or adjacent to the FMU, that are either owned or in the control of the certificate holder.

Washington DNR confirmed that DNR-managed facilities within, adjacent to or outside of the FMU contribute to the forest management objectives within the South Puget HCP Planning Unit but cannot conform to the 2019 FSC pesticide policy because those facilities use pesticides that appear on the FSC List of Highly Hazardous Pesticides (FSC-POL-30-001a). Washington DNR’s use of pesticides follows all local, state and federal laws on pesticide use and they do not use any pesticides from the World Health Organization 1a or 1b list. Washington DNR concluded that the excision of the 9 properties will not affect DNR’s ability to conform to the US FSC FM Standard or the 2019 FSC Pesticide Policy on the balance of its lands (99.97%) within the FMU.

4.3 - Use of chemicals

Chemical pesticide name	Active ingredient of the chemical product	Reason for use	Approximate quantity used / year	Size of area treated annually ¹
			0 liter, m3 tonnes	0 hectares
AQUANEAT	Glyphosate	Site preparation to control herbaceous and woody vegetation	1277.58 liter	530.13 hectares
GARLON 4	Triclopyr	Vegetation management to control woody and herbaceous vegetation	NONE	

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

GARLON 4 ULTRA	Triclopyr	Vegetation management to control woody & herbaceous vegetation	75.71 liter	57.47 hectares
ROUNDUP_CUSTOM	Glyphosate	Site preparation to control woody vegetation and grasses	88.14 liter	
OUST EXTRA	Sulfometuron methyl	Site preparation to control grasses, weeds and vines	124.79 liter	75.27 hectares
TRANSLINE	Triclopyr	Site preparation to control broadleaf weeds	99.37 liter	
POLARIS_SP	Amazapyr	Site preparation to control grasses/broadleaf weeds	396.65 liter	
ROTARY_2_SL	Amazapyr	Site preparation to control grasses/broadleaf weeds	952.98 liter	
		TOTAL		662.87 hectares

1. chemicals are applied as a herbicide mix as follows:

Herbicide Mix	hectares
OUST_EXTRA + POLARIS_SP + ROUNDUP_CUSTOM	75.27
GARLON_4_ULTRA	57.47
AQUANEAT + OUST_EXTRA + ROTARY_2_SL	303.11
AQUANEAT + OUST_EXTRA + ROTARY_2_SL + TRANSLINE	88.22
AQUANEAT + OUST_EXTRA + POLARIS_SP	112.50
AQUANEAT + OUST_EXTRA + POLARIS_SP + TRANSLINE	26.30
Grand Total	662.87

The table lists those chemicals that were applied from July 1st, 2018 through to June 30th, 2019 (fiscal year). Washington DNR uses a variety of chemicals to control competing vegetation in regenerated sites and as a site preparation tool prior to establishment of regeneration to control competing vegetation. Washington DNR does not apply any chemicals listed on the FSC List of Highly Hazardous Chemicals.

4.4 - Number of accidents in forest work (serious/fatal) since the last audit

There have been no serious accidents or fatalities involving either State employees or its contractors over the past year.

5 - Standard

	Ref / n° management FSC national standard	Ref / n° checklist	Other documents if relevant
Surveillance 2	FSC FM Standard for US v1.0, 2010	SF03 FSC FM US checklist rev2.2, 2017	FSC-POL-20-003 V1 FSC-STD-20-007 FSC-STD-20-006 FSC-POL- 30-001a FSC-STD-40-005 V3-1 FSC-POL-30-001 V3 FSC-STD-01-001 V5-2

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

	Ref / n° management FSC national standard	Ref / n° checklist	Other documents if relevant
			FSC-STD-50-001 V2

6 - Observation

6.1 - Documents reviewed

Administrative and legality (taxes, land use rights, etc.)

- South Puget HCP Planning Unit Forest Land Plan Final EIS
- Timber Sales Contract Clause and Administration Manual.
- Silviculture and harvest Contract Templates
- Policy for Sustainable Forests
- Forest Practices Civil Penalties
- Washington DNR’s Annual Report 2018
- ILO core conventions : Human Rights policy, child labour policy
- Law Enforcement Policy, Incident reporting
- State Lands Records (RCW 79)
- Special forest products : SPS brush and bough lease Plan 2008-2022

Internal social issues (accident records, safe and safety policies, trainings records, etc.)

- *DNR agency-wide safety survey*
- Safety and Health Policy (2017)
- State Lands Training Book for Forester 1
- State Lands Quality Initiatives Memo on improving training
- Forest Practices and Procedures, Forest Practices rules

External social issues (complaints or conflict records, stakeholder consultation process etc.)

- Tribal Relations Website(s) (WADNR and SharePoint)
- Commissioner’s Tribal Relations Order #201029, 2010
- 2017 Tribal Summit Agenda
- Logger Safety Initiative
- Safety Standards for Logging Operations
- SIC Recommendations for Qualified Loggers
- Forest Land Planning Spatial Layer Info w/public comments
- DNR Social Impact Assessment Summary

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

- Final Environmental Impact Statement on Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington and for Determining the Sustainable Harvest Level
- Process: Notifying adjacent landowners re Timber Sale
- DNR Natural Areas Conservation
- DNR Forest Health commitments

Environmental and HFCV (chemicals records, HCVF records, etc.)

- DNR SEPA Handbook
- Old Growth Policy
- Wildlife Habitat Policy
- Watershed Systems Policy
- Riparian Conservation Policy
- Special Ecological Features Policy
- Identifying and Managing Structurally Complex Forests to meet Older Forest Targets
- Talus Fields
- Cohorts, Legacy, Leave Trees
- DNR's Natural Areas Program Information (Sept 2015)
 - Natural Area Preserves locations/descriptions
 - Natural Resource Conservation Areas locations
- Natural Heritage Plan
- DRAFT Special Ecological Features Procedure (March 2015)
- HCP, 1997
- Briefing Paper for Puget Sound Partnership Ecosystem Coordination Board, DNR
- Pesticides and Forestry Fact Sheet, DNR (January 2018)
- Final EIS and sustainable harvest calculation
- DNR Forest Health budget request 2017-19

Management and harvesting operation (management plans, inventory records, harvesting records, etc.)

- FINAL Environmental Impact Statement (EIS) On Alternatives for Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington
- Land Resource Manager Database
- Timber Sale Contract Clause and Administration Manual (October 2019)
- Timber Sale Logging Plan of Operations form
- Timber Sale Contract template
- Elbe Field Package

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

Monitoring process (FMU composition/ modification records, invoices and other sales records, environmental KPI records, sub-contractor contracts and KPI, records of member monitoring for group certificate etc.)

- Average annual cut / annual growth for south Puget (growth / yield)
- Land Resource Manager Database
- AAC EIS Appendix E Management Procedures.pdf
- Sold Sales in South Puget HCP Planning Unit.
- Natural Areas Monitoring / Volunteer / Partnership
- DNR Annual Report 2018
- FSC_Species_Volume_Value_FY09-FY19_updated.xls
- FSC_Silv_Reports_FY19_Final.xls
- 910_911_912_FY19_tables.xls (actual harvest & retention area)

6.2 - Evaluation results with reference to the FSC referential / standard which must be evaluated in the surveillance audit

PRINCIPLE 1: Compliance with law and FSC Principles

Criterion 1.5: Washington DNR complies with all applicable laws and regulations. The Department carries out a variety of compliance monitoring activities, related to both the Habitat Conservation Plan and the State Forest Practices Act. DNR restricts and controls access to State lands when necessary, using road abandonment, gates and signs. There was no evidence to suggest illegal logging is an issue on the South Puget Planning Unit.

DNR has a law enforcement program charged with monitoring permits, investigating trespass, and wildfire investigation. Data is compiled into a report in Region/ Division Incident Reporting system. DNR law enforcement is responsible for enforcing laws and curtailing illegal activities. There are three law enforcement officers for South Puget Sound that move within the region as needed.

During the field tour auditors viewed a rehabilitated gravel pit that, until recently, was being used unsafely for target practice. When DNR realized the unsafe condition they responded correctly by closing the pit and rehabilitating the pit site. No non-conformances were raised against this Criterion.

PRINCIPLE 2: Tenure and use rights and responsibilities

Washington DNR is a state agency and has clear title to the state trust lands, with title deeds and survey records being stored in its Olympia office. There have been no recent disputes over tenure and use rights on the FMU. There have been disputes in the past with individual tribes which have been litigated and resolved. Traditional uses (especially for aboriginal peoples) are respected through the Cultural Resources Policy of the agency. The State of Washington has entered into a variety of agreements with aboriginal peoples (e.g. tribes) to protect traditional use rights.

Each timber sale is reviewed by the public for input, including from affected indigenous peoples. Meetings are held with local tribes to discuss upcoming activities. DNR's state lands archeologist works with local tribes prior to setting up a timber sale if it is suspected

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

a cultural resource may be present. This effort ensures protection of known cultural resources. No non-conformances were identified against this principle.

PRINCIPLE 3: Indigenous Peoples' Rights

Criterion 3.2.: Washington DNR maintains government-to-government relations with the 13 federally-recognized Indian Tribes residing in the South Puget Sound HCP planning area. The department recognizes the Tribes' separate rights and authorities and commits to work to resolve problems, and to develop relations at all levels of the department to assure good communication and availability of technical and policy expertise. The Commissioner's order on tribal relations -- "*It is further ordered that DNR staff members are encouraged to resolve mutual issues and concerns with the Tribes whenever possible at the organizational level that is closest to the issue and that has appropriate delegated authority*" has been seen to be well implemented.

DNR works closely with local tribes to ensure measures are taken to protect tribal resources. Auditors were told DNR is working on a shared access agreement with all tribes, for tribal access for hunting, fishing and gathering.

DNR has a tribal relations program that includes annual summit meetings inviting all federal and non-federal recognized tribes within the State of Washington. The DNR has a very strong relationship with aboriginal peoples. No non-conformances were issued against this Criterion during the audit.

PRINCIPLE 4: Community relations and worker's rights

Criteria 4.2; 4.4: DNR has a robust health and safety program that is readily available to all employees. As a state agency health and safety insurance must meet all applicable state and federal laws and address health considerations for employees and contractors. All service contracts include requirements to ensure State and federal health and safety requirements are met. During the audit auditors observed one sub-contractor who did not adhere to the contract requirements for health and safety. Auditors observed DNR contract administrators, responsible for contract implementation oversight, did not enforce contract requirements for health and safety or understand it was their responsibility to do so. A minor non-conformance (**SB/001**) is issued to ensure health and safety contract requirements are fully met.

The land management planning process requires DNR to obtain input from the public and other interested parties. The Forest Practices Application (FPA) process includes a public review that invites comment on any activity requiring a FPA (e.g. timber harvest or road construction). Additionally, DNR sought extensive public and stakeholder input on the development of the Marbled Murrelet Long-term Conservation Strategy (i.e. Final EIS). On a local level, auditors heard regular communications and correspondence is common between Agency staff regarding a variety of issues including timber sales and pesticide spraying. One minor non-conformance against 4.2 was issued in this surveillance audit. The balance of the Criteria are in conformance.

PRINCIPLE 5: Benefits from the Forest

Criteria 5.6: The South Puget HCP Planning Unit is a significant contributor to the economy with average annual timber sales in FY19 of approximately \$41 million and leasing revenues of nearly \$1 million. DNR does not permit export of logs, which reinforces the local economy and favors local producers. The funds generated by resource management are distributed to the various public trusts, which fund statewide construction of public schools, universities, prisons and other state institutions. The funds generated provide for services in many counties, such as libraries, firefighting, and hospitals.

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

Harvest sites visited during the audit were found to be efficiently harvested with little marketable timber going to waste. High levels of timber utilization were found throughout the South Puget HCP Planning unit. Down-woody-debris was plentiful on all harvest sites as were standing trees (Figure 1). No non-conformances were identified against this principle.

Figure 1: example of downed woody debris after harvest



PRINCIPLE 6: Environmental Impact

Criteria 6.2, 6.3, 6.9 : The South Puget HCP Planning Unit has a Final EIS (2010) which has been reviewed extensively by the public prior to approval. Annual reports on the implementation of the HCP (FY18 reviewed) address progress towards conservation objectives (e.g. riparian habitat, Spotted Owl, Marbled Murrelet), adaptive management, silvicultural activities, roads management, land transactions, non-timber management activity, and recreational programs. The HCP, EIS and annual reports are available online.

Environmental impacts of forest management have been addressed at the forest level through the HCP and EIS. These documents assess potential impacts at a strategic level. At the planning stage for each site, detailed plans are created to identify features that might be impacted by forest operations (i.e. access, cultural resources, harvest, silviculture), and prescriptions are applied to mitigate the impacts. For example, riparian areas and recreational trails are pre-identified and set prescriptions are applied. Pre-harvest boundary marking, and cruising identify most other stand level features (e.g. nests, wet areas) that might have been missed in site documents.

Harvest prescriptions include direction for leave tree retention, soil impact management, and riparian management zones. Habitat features for rare, threatened or endangered species are applied at both the strategic level and in the detailed harvest preparation. Innovative methods to create foraging and dispersal habitat for northern spotted owls are being applied. Auditors observed one operational research trial during the surveillance audit.

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

The South Puget Sound Planning Unit credible assessments are made for RTE species and their habitat. In addition, a SEPA checklist is completed for each timber sale that is proposed. Each HCP conservation objective is addressed in the SEPA checklist. The FPA also addresses several of the HCP objectives when applying for a harvest permit.

The State Environmental Policy Act (SEPA) is applied on all timber sales. DNR pre-harvest reviews are conducted for each activity to confirm site conditions and determine environmental liabilities. A review of site records confirmed that impacts are considered before management activities are initiated. Physical inspection on-the-ground confirmed the commitment to “grow” a more natural and less industrial forest. Residual trees were evident on every harvest block and many of these were excellent “habitat” trees. Discussions with DNR staff showed a high level of awareness of strategic direction to maintain and enhance long-term ecological functions. An interview with one contractor confirmed a good understanding of the site specific requirements for riparian and leave tree protection.

Planning and implementation of forest management activities are directed by a wide range of policies, procedures and recommendations which includes Washington State Forest Practice Rules and Regulations, Forest Practices Habitat Conservation Plan, DNR State Lands Habitat Conservation Plan, Habitat Conservation Plan Riparian Forest Restoration Strategy, Procedures on Silviculture Prescriptions, and SPS Prescription Summaries.

The Washington State Forest Practices Act requires identification of steep, unstable and highly erodible soils/geologic formations. No significant soil disturbance was observed within the portions of the field sites visited.

There is a considerable effort to promote habitat for RTE species. Suitable stands for potential habitat were identified. Harvest prescriptions are made based on current stand conditions, and the desired future condition to enhance foraging and dispersal habitat. The objective of the HCP is to provide NSO dispersal habitat between suitable nesting habitat on adjacent federal lands. The HCP is also designed to encourage recovery of listed anadromous fish species and the marbled murrelet. Auditors observed how marbled murrelet suitable habitat is identified and protected and how Regional biologists work with field staff to create suitable habitat for Spotted Owl through harvest pattern.

The Natural Heritage Plan identifies species that may be rare or threatened. The Forestry Handbook is an assembly of policies, procedures and guidelines that direct management of resources on State trust lands.

DNR maintains a spatial data layer of old growth forest and individual trees. The Westside Old Growth Habitat Index (WOGHI) is a screening tool used to identify potential areas that meet DNR’s old-growth definition. Every timber sale is screened for presence of old-growth stand structure and age, and for presence of pre-euro-American settlement trees. If potential old-growth forest is identified in WOGHI, a specially trained “old-growth designee” conducts a field verification.

The Riparian Forest Restoration Strategy (RFRS) is implemented through the procedure that guides land managers in typing streams and wetlands and creates guidelines for buffers by water types. The management goal of the RFRS is to contribute to the

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

conservation of other aquatic and riparian obligate species and to restore structurally complex riparian forests

Uncommon habitat is one of the attributes used to raise habitat to featured status. Snags, legacy trees, and large down woody debris (LDWD) are routinely left on all harvest areas. DNR retains a minimum of 20 trees per hectare (8 trees per acre) in addition to the riparian and wetland areas, which are additional acres that are protected. The auditors observed several harvest units with both clumped and dispersed leave trees. The leave areas were not quantified on sites inspected, but every site had obvious leave trees (20+ per hectare), as well as, peninsular leave areas and riparian areas where all vegetation remained.

On most harvest sites viewed on the audit, the predominate native tree species is Douglas Fir (*Pseudotsuga menziesii*) which requires large openings for regeneration and vigorous young-stand development. The harvest systems used were found to be appropriate and effective for conifer regeneration. Planting enhances the diversity by controlling species composition and age distribution. Regeneration harvest blocks in even-aged stands average 40 acres or less. However, some individual harvest blocks can exceed 60 acres. The Department's PSF, developed by a qualified team of experts, allows harvest blocks up to 100 acres to reduce edge-effect, reduce roads on the landscape and to reduce the number of entries into a stand/block. Clumped and/or dispersed leave trees are required to be left in all harvest units. Also, most blocks viewed during the audit include wetland protection and/or riparian leave tree areas.

An observation (**OBS-3**) in SV1 encouraged DNR to review the potential loss of productive land due to a buildup of logging debris at roadside and to explore methods (i.e. prescribed fire) for reducing fire hazard close to urban areas. The auditor reviewed changes to timber sale contracts and considerations in training documents and is satisfied that DNR has resolved the observation satisfactorily. Observations during the field audit confirm that roadside logging debris is being addressed.

Observations confirmed most surfaced roads are water-barred and generally barricaded. Some roads are gated, and access is restricted for all or part of the year. Designated roads are open to the public for recreation and hunting. The Washington Forest Practices Act includes regulations related to water quality. Observations during the audit support that Washington DNR exceeds the Forest Practices Act requirements in many situations and has an excellent program of water quality protection. Stream crossings are designed for the 100-year flood event. The South Puget Unit has a list of all crossings that are fish barriers and has undertaken their removal or replacement. Auditors issued an observation (**OBS-4**) in SV1 based on 2 instances of unstable banks with the potential for soil material to wind up in adjacent water courses. Observations during this audit did not note any instances of unstable banks (see Figure 2). This issue is closed.

Figure 2: Example of stable banks on approach to water crossing

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit



Field staff undertake noxious weed control as budgets allow, working cooperatively with counties and other groups. DNR employs several different techniques to limit the impact of the noxious weed on forest stands (e.g. herbicide application, pulling and slashing). To date, DNR has been moderately successful in limiting the impact of this noxious weed on recently planted trees. However, regular monitoring of affected sites, early intervention, continued weed control applications, ongoing research and public awareness and assistance should prove effective.

DNR undertakes some ground and hand herbicide applications on a small percentage of the ownership. Herbicides are used to either prepare sites for regeneration through vegetation control or to release trees from vegetative competition.

No non-conformances were identified against this principle.

Principle 7: Management Plan

Not audited.

PRINCIPLE 8: Monitoring and Assessment

Criteria 8.2: Washington DNR has a robust system for monitoring activities, resources and forest conditions. Forest operations are monitored through the Land and Resource Manager (LRM) system which is a repository for all management information for a stand or site. Road inspections are carried out by DNR forestry and roads engineering staff. Auditors issued an observation (**OBS-4**) in SV1 based on 2 instances of unstable banks that could have resulted in siltation into adjacent water courses. Observations during this audit did not note any instances of unstable banks. This issue is closed.

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

The LRM database contains all the information for each stand within the FMU. The LRM report records salvage and other unexpected removals. Past events for each stand are recorded, including any removals due to catastrophic events. Natural areas are monitored with results recorded. Intensive Management Foresters record stands with invasive species, specifying the type of invasive, if it has been treated and how it was treated. Harvest activities are monitored with results recorded on a harvest inspection form. The agency wildlife biologists monitor the results of habitat enhancement harvests to ensure it is directed at the 8 key NSO requirements.

The DNR also monitors rare, threatened and endangered (RTE) species through the Habitat Conservation Plan (HCP) which protects several RTE species. DNR reports annually on progress toward meeting HCP objectives. The implementation monitoring program covers many of the HCP objectives including no harvest areas and buffers.

DNR has a detailed chain of custody system for its timber. This includes special load tickets and contract specifications.

No non-conformances were identified against these Criteria.

PRINCIPLE 9: Maintenance of high conservation value forests

A well developed program is in place to identify, catalog and monitor HCV attributes (i.e. northern spotted owl, marbled murrelet). Objectives for their protection/enhancement are found in the HCP.

DNR maintains a Natural Heritage Advisory Council that serves several functions including recommendations for natural area preserves and conservation areas (e.g. HCVFs) and guidance for their management. WDNR personnel and partners (i.e. science community, conservation groups) assist with monitoring and/or scientific studies. Auditors viewed one operational research trial to adjust tree retention prescriptions and the harvest size to enhance habitat for the Northern Flying Squirrel, the primary prey of the Northern Spotted Owl (RTE species).

No non-conformances were identified against this Principle.

PRINCIPLE 10: Plantations

Criteria 10.6; 10.7; 10.8: Not audited.

6.3 - Result regarding the correction of Non-Conformities (NC)

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non-conformities	Closure date
		MAJOR			None				
1	1.6a	MINOR	9/04/18	The State of Washington is unable to sign the current Policy of Association Declaration (FSC-POL-01-004) due to conflicts with their legislative mandate and the constitutional rule of law.	The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy of Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government.	9/04/19		Washington DNR will continue to analyze the potential legal consequences that signing the PfA/Annex C might have for our operations, our certificate, and our stakeholders. Between now and the Washington DNR's 2018 FSC audit, the agency will seek further information. <ol style="list-style-type: none"> 1. What is the expected release date of the Policy for Association, Version 3? 2. Engage the State Attorney General's office, DNR executive management, and/or staff experts as needed to re-evaluate previously identified concerns associated with the HCVF and ILO language in the existing PFA. 3. If Version 3 of the PfA is released, consult with the internal groups identified in #2 to determine whether the new language has mitigated previously identified risks and/or evaluate any remaining risks against the risks brought on by not signing the self-declaration. 	11/11/18

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

6.4 - Result regarding the resolution of complaints

Stakeholders reference (name / organisation / type)	Date	Received complaints	FSC criteria-indicator	Checked on site (YES or NO)	Answer (+Date)		
					Client	lead auditor	Bureau Veritas Certification
		None					

6.5 - Result regarding previous observations

n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence	Status (closed, still open, upgraded to minor NC)	Evidences for closure
3	11/10/18	6.3.i – Slash piles accumulation presents a fire hazard.	Observation triggered by discussions during the field audit around a landowner asking to have slash pulled back from edge of property because of fire risk. Observations during the audit noted slash being piled on site but not being burnt. Discussions with staff suggest there is interest in prescribed burning debris piles. Auditors noted the potential for loss of productive landbase over time (areas regenerate slower). Auditors noted logistics issues with carrying out burning near urban areas, but that prescribed burning might assist in reducing the fire hazard debris piles create.	Closed	Auditors reviewed changes to the burn permit process to allow for slash removal with fire. Observations in the field confirm this observation is being addressed.
4	11/10/18	8.2.d.1 – In a Type 4 watercourse observed small slump of soil with potential to end up in water channel.	Observations during the audit in 2 different locations and discussions	Closed	Observations during the audit did not note any

FSC™ Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

			around bank stabilization has prompted this observation. The lack of soil stabilization will result in soil material running into the watercourse in the next heavy rain. This situation must be corrected and monitored. Two examples were observed (on the approach to a temporary bridge on West Tiger Mountain and a new road in the Double Span timber sale Unit 2, Black Diamond Unit).		issues with bank stabilization. At one site auditors viewed a road bank and right-of-way remediation that had recently been completed. The remediation was to repair vegetation

**FSC™ Forest Management Certification
Surveillance Audit Report****Washington State Department of Natural Resources – South
Puget Sound HCP Planning Unit****7 - Result of surveillance evaluations**

MAIN ASSEMENT DATE	
Number of NC closed	None
Pending NC	None
New NC raised	Washington DNR-499224-US.2742601 – FSC FM- SF02-NC1
Certification Decision	Recommended
SURVEILLANCE 1 DATE	
Number of NC closed	Washington DNR-499224-US.2742601 – FSC FM- SF02-NC1_CLOSED
Pending NC	None.
New NC raised	None.
Certification Decision	Recommended
SURVEILLANCE 2 DATE	
Number of NC closed	None.
Pending NC	None
New NC raised	Washington DNR-499224-US.2742601 – FSC FM- SF02-SB001_SV2
Certification Decision	

7.1 - Synthesis on the conduct of the audit and closing meeting

The results of the surveillance audit were presented to the Certification Manager and key management staff at the closing meeting. There was 1 new non-conformance identified during the conduct of the audit resulting in a very positive audit outcome overall. Questions were asked about the non-conformance. There was some discussion pertaining to the excision request from DNR. There was also discussion regarding continued FSC certification and whether DNR would consider certifying additional planning units to FSC. The closing meeting and surveillance audit was concluded with a proposed date for SV3.

8 - Records of Non-Conformities and observations and new ones raised during the audit

**FSC™ Forest Management Certification
Surveillance Audit Report**

**Washington State Department of Natural Resources – South Puget Sound HCP Planning
Unit**

8.1 - Records of Non-Conformities

New Non-Conformities raised during the audit, or pending Non-Conformities:

Word file name: Washington DNR-499224-US.2742601-FSC FM-SF02-SB001_SV2.docx

n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non-conformities	Closure date
		MAJOR							
SB/001	4.2b	MINOR	17 Oct. 19	State law requires PPE to be worn at all times on logging operations. The surveillance audit found the Forest Manager was not enforcing the Timber Sale contract that requires complying with all regulations and laws.	<p>During the surveillance audit logging road construction crews in NISQUALLY VDT, VRH & RMZ were not wearing full PPE (hard hats, high vis) when the workers got out of their equipment. Interviews with DNR staff confirmed they were not consistently enforcing health and safety requirements outlined in the Timber Sales contracts.</p> <p>State law regulation WAC 296-54 indicates logging operations, including road construction, must always have proper and appropriate PPE on “whenever there is the potential exposure to danger of flying or falling objects” unless they are in the equipment cab. There is an expectation with FSC certification that is clearly stated in the Guidance for Criteria 4.2 (i.e. PPE being worn) is demonstration that the Forest Manager is meeting and/or exceeding legal requirements. Auditors interviewed DNR staff and found they were unclear if they had authority to enforce health and safety requirements on sub-contractors. The audit was only able to visit one active operation and for this reason have graded the non-conformity as a minor.</p>	16 Oct. 20			

8.2 - Records of observations

New observations raised during the audit, or pending

n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence
		None	

**FSC Forest Management Certification
Surveillance Audit Report
Washington State Department of Natural Resources – South
Puget Sound HCP Planning Unit**

9 - Proposals regarding the certification decision

9.1 - Proposal of conclusion on whether the candidate entity achieved or not the required level of conformance

The certificate holder is in continued conformity with the certification requirements.
The certificate should be maintained.

10 - Certification decision

The HUB decides that the FSC FM certificate of Washington State Department of Natural Resources remains valid. The 1 minor non-conformity shall be closed by 16.10.2020.

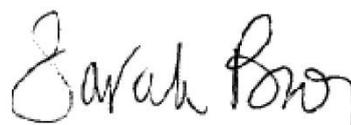
Issued the January 3, 2020, reviewed the May 21, 2020, final review the May 25, 2020

FM certification technical manager,



Holly LIU

Lead Auditor,



Sarah Bros, R.P.F.

11 - Appendices

- A. CV of the members of the audit team
- B. SF-03 Checklist(s) (under separate cover)
- C. SF-02 non-conformity form(s)
- D. DNR Excision Supporting Documentation

FSC Forest Management Certification Surveillance Audit Report Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

Appendix A

CURRICULUM VITAE

Sarah J. Bros R.P.F.

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North Bay, Ontario, Canada

P1C 1H3

Tel/Fax: 705-475-9083 Cell: 705-498-4165

Email: sarah.bros@merinfo.com

Website: www.merinfo.com

WORK AND BUSINESS ACCOMPLISHMENTS

1999-Present: Partner, Merin Forest Management, North Bay, Ontario

- A principal partner, forester and management consultant with an entrepreneurial and creative outlook providing forest management and auditing services; change management; and, strategic and operational planning to natural resource-based industries, law firms, private landowners and Indigenous communities.
- Thirty-five years forest management planning and silviculture experience in the Boreal and Great Lakes-St. Lawrence forests of Canada. Professional contacts throughout provincial governments and forest industry across Canada.
- Director, **Algonquin Forest Authority** Board, Algonquin Provincial Park, Ontario 2013-present
- past-member, **Ontario Professional Foresters Association (OPFA)** Board 2010-2015
- Chair, Awards & Recognition Committee, OPFA 2015 - present
- past-Director, **Ontario Forest History Society** Board 2013 - 2017

Merin Forest Management Recent Projects:

- Provide strategic forest management and business advice to the first Local Forest Management Corporation (LFMC) Nawiinginkima Forest Management Corporation (NFMFC) under the Ontario Ministry of Natural Resources & Forestry (MNRF) new tenure model (2014 – present) (~1 million hectares); co-Chair 2019 FMP Planning Team for Pic Forest
- Planning Forester for Whitefeather Forest, including forest management and business advice to first all-Indigenous Sustainable Forest License in Ontario (2018 – present)
- Provide Lead Auditor, FSC, and SFI Auditor services to Bureau Veritas (2014 to present)
- Provide audit services for regulatory audits (Independent Forest Audit) of forest management in Ontario (2016- present)
- FSC/SFI Lead Auditor with Bureau Veritas (2014-present) and FSC Lead Auditor with Rainforest Alliance (2013-2014)
- Provided contract services as a Forest Audit Analyst for Ontario's Independent Forest Audit (IFA) Program and other related programs on behalf of the Forestry Futures Trust Committee, (2002 – 2016)
- Provided contract services on behalf of independent loggers on Abitibi River Forest (ARF) (2015-2017)
- Provided strategic forest management and business advice services to Haavalsrud Timber Company (now Homepayne Lumber) (2014-2015)
- assist with forest management for large private land holders including MFTIP plans - 9,000ha Timmins Forest Products; 70,000ha Estate of F.W. Shumacher; 10,000ha Smooth Rock Falls Freehold Kreative Ventures Ltd. (William F. White International Inc.), Timmins Forest (Sanford Investment Corp.) 48,000ha; Timber Bay 50,000ha
- Working Group member, Ontario MNRF redesign of Silviculture Effectiveness Monitoring policy, 2014-2015
- Negotiated first permit for forest operations under the Endangered Species Act (ESA) and Ontario's Caribou Conservation Plan, 2013-2014
- Consulting Forester to Olthuis, Kleer, Townshend LLP (OKTLaw) 2014 - 2017
- Caribou Advisory Committee member for the 2013-2033 ARF Forest Management Plan (FMP)
- Assisted in the development and implementation of a Land Use Plan for the Aundeck Omni Kaning First Nation, Manitoulin Island, 2012-2013.
- Assisted in the development and implementation of the first Land Management Agreement (LMA), in Ontario, between Ministry of Natural Resources & Forestry (MNRF) and a large private landowner.

FSC Forest Management Certification Surveillance Audit Report Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

- Assisted in several private land timber valuations on behalf of international buyers
- Facilitated introductory meeting between First Nations and OMNRF related to "duty to consult" with First Nations Manitoulin Island

1998-1999: Management Forester, Buchanan Forest Products Ltd, Manitowadge, Ontario.

- Managed the Big Pic and Black River sustainable forest licence areas (900,000 hectares)
- Managed all aspects of the forest management & silvicultural program on three forests (included contract negotiations, budgeting, managing Forest Renewal Trust Fund expenditures, database management).
- successfully negotiated one of 1st Indigenous silviculture agreements on Pic River-Ojibway Forest.

1986-1999: Management Forester/Office Manager, North West Timber Ltd., Manitowadge, Ontario.

- Partner (49%) in a contract logging and forest management services company established in 1986 that employed 40-50 and grew to annual revenues of \$8,000,000 while contracting to Buchanan Forest Products (Thunder Bay, On) and Domtar (White River, On).
- Contracted forestry management services to licence holder Buchanan Forest Products including all silviculture, production 3 forest management plans, liaison with MNRF, silviculture contract negotiations, Forest Renewal Trust Fund budgeting (in excess of 6 million dollars), invoicing and reconciliations on 2 licenses (~ 900,000 hectares).
- Oversaw the establishment of over 56 million trees on 3 licenses.
- Designed a computer database for storing information on silviculture projects established under FMA/ SFL (later converted to Access database and then GIS)
- Managed day-to-day office operations of company including negotiating and administering company benefits plans, office administration, staff payroll, and government payments.

EDUCATION & TRAINING

- **FSC Certified Auditor, April 2017**, Forest Stewardship Council
- **FSC Lead Auditor Training/ISO 14001 certification 2013**, Rainforest Alliance, Ottawa, ON
- **CBM-CFS3 Carbon Budget Modeling 2012**, Centre for Learning Laval University, Quebec
- **Bachelor of Science Forestry (BScF), 1983**, University of Toronto, Toronto, ON

LICENSES & CERTIFICATES

- Member **Ontario Professional Foresters Association** since 1985, Registered Professional Forester (R.P.F.) No. 1374.
- **Managed Forest Plan Approver (M.P.A.)** Managed Forest Tax Incentive Program since 2007, No. 319.

VOLUNTEER WORK

- Councilor, Ontario Professional Forester's Association (OPFA) 2010 – 2015
- Executive Committee, OPFA 2014-2015
- Chair, Awards & Recognition Committee, 2015 – present
- Trees Canada TD Green Streets Applications Review Committee, 2014 - 2017
- Chair, Advocacy (nee Career Awareness) Committee, OPFA 2011 - 2014
- Member of Private Lands Committee, OPFA 2009 – 2015
- Member of Crown Lands Committee, OPFA 2010 – present
- Member of Growing Professionalism in the Forest Committee, 2010-2015
- Board of Directors, Canadian Institute of Forestry – Algonquin Section 2010
- Registrar & Committee Member, OPFA Annual Conference and Meeting 2009, 2016
- Board of Directors, Skate Canada Northern Ontario 2004-2008
- President, North Bay Figure Skating Club 2000-2004, Registrar 2004-2007, Test Chair 2005-2007; Chair, Make It A Date To Skate Competition 2001-2007; Chair, North Bay Skaters Development Fund 2004-2007
- Girl Guides of Canada 1985 – 1999, Elected Member, Ontario Provincial Council, Girl Guides of Canada
- Elected member, Manitowadge Economic Development Committee 1994-1999

FSC Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

APPENDIX C

	SF02 NON-CONFORMITY REPORT		
	Wood Schemes		
Date	Client Name and Site:	SF02#:	
October 17/19	Washington State Department of Natural Resources	SB/001	
Non-conformity Observed During:	Surveillance Audit		
Process:	FSC		
Standard / Reference Document:	FSC - US FM STANDARD V1.0		
Clause:	4.2 b		
REQUIREMENT OF AUDITED STANDARD:			
The Forest Manager meets or exceeds all applicable laws and/or regulations requiring health and safety of employees and their families.			
STATEMENT OF NON-CONFORMITY:			
State law requires PPE to be worn at all times on logging operations. The surveillance audit found the Forest Manager was not enforcing the Timber Sale contract that requires complying with all regulations and laws.			
OBJECTIVE EVIDENCE FOR RAISING NON-CONFORMITY AND JUSTIFICATION OF THE GRADE			
During the surveillance audit logging road construction crews in NISQUALLY VDT, VRH & RMZ were not wearing full PPE (hard hats, high vis) when the workers got out of their equipment. Interviews with DNR staff confirmed they were not consistently enforcing health and safety requirements outlined in the Timber Sales contracts.			
State law regulation WAC 296-54 indicates logging operations, including road construction, must always have proper and appropriate PPE on "whenever there is the potential exposure to danger of flying or falling objects" unless they are in the equipment cab. There is an expectation with FSC certification that is clearly stated in the Guidance for Criteria 4.2 (i.e. PPE being worn) is demonstration that the Forest Manager is meeting and/or exceeding legal requirements. Auditors interviewed DNR staff and found they were unclear if they had authority to enforce health and safety requirements on sub-contractors. The audit was only able to visit one active operation and for this reason have graded the non-conformity as a minor.			
Grade	Lead Auditor	Auditor raising NCR	Client Representative
Minor	Sarah Bros	Sarah Bros	
To be Completed Before:	October 16, 2020		
ROOT CAUSE ANALYSIS AND CORRECTIVE ACTION *			

FSC Forest Management Certification Surveillance Audit Report Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

APPENDIX D



DEPARTMENT OF
NATURAL RESOURCES
Forest Resources Division
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August 7, 2019

Bureau Veritas Certification North America
16800 Greenspoint Park Drive, Suite 300S
Houston, TX 77060

Subject: Excision of nine non-contiguous areas from the scope of the Washington Department of Natural Resources' current Forest Stewardship Council Forest Management certificate

To Whom It May Concern:

The Washington Department of Natural Resources (DNR) State Lands has maintained a Forest Stewardship Council (FSC) Forest Management (FM) certificate on forestlands in its South Puget HCP Planning Unit since 2007. As of our most recent audit in October 2018, the certified area covers 71,311 hectares, or 176,207 acres. DNR seeks to excise a total of 416.5 acres from the scope of its certificate. Of those acres, 269.5 are located outside the South Puget HCP Planning Unit. Another 100 acres are identified as non-forested in DNR's GIS system. As a result of this excision, a total of 47 acres of "forest-managed" land will be subtracted from DNR's FSC-FM-certified landbase, or 0.03% of the certified area. None of the excised acres, either within the South Puget HCP Planning Unit or outside of it, are being used to grow trees for timber harvest.

Rationale

FSC-International published its new Pesticides Policy (FSC-POL-30-001 V3-0) on May 1, 2019. Whereas the previous FSC pesticide policy applied to "the use of pesticides in FSC-certified forests and plantations," the scope of the new pesticide policy is much broader. The 2019 policy applies to the certificate holder's "management unit" as defined in FSC-International's FSC Principles and Criteria (FSC-STD-01-001 V5-2) from 2015. That definition reads:

A spatial area or areas submitted for FSC certification with clearly defined boundaries managed to a set of explicit long term management objectives which are expressed in a management plan. This area or areas include(s):

- all facilities and area(s) within or adjacent to this spatial area or areas under legal title or management control of, or operated by or on behalf of The Organization, for the purpose of contributing to the management objectives; and
- all facilities and area(s) outside, and not adjacent to this spatial area or areas and operated by or on behalf of The Organization, solely for the purpose of contributing to the management objectives. (Source: FSC 2011).

FSC Forest Management Certification Surveillance Audit Report Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

Several DNR-managed facilities within, adjacent to, outside of, or non-adjacent to FSC-certified forestlands in the South Puget HCP Planning Unit contribute to the agency's forestry objectives within the South Puget HCP Planning Unit but cannot conform to FSC's 2019 Pesticides Policy. Those facilities are listed and described below under the heading, "Excised Facilities."

The first seven excised facilities (Belfair, Mineral, North Bend, Port of Shelton, and Tacoma work centers; the South Puget Sound Region Office, and the Tumwater Compound) are essentially office buildings surrounded by parking lots, driveways, storage sheds and other outbuildings, warehouses, lawns, and/or courtyards. DNR (or the facility's owner where DNR is a tenant) reserves the right to use routine pest control options, including the use of chemical pesticides, to avoid insect and/or rodent infestations (e.g. placement of rodent bait traps around building perimeters, use of insecticides to remove yellow jacket nests, fumigating or spraying for termites, etc.). Groundskeepers may elect to use herbicides to control onsite vegetation (e.g., spot-application of herbicide in parking lots, chemical treatment of encroaching brush, removal of moss from a building's exterior, etc.). Maintenance staff may need to use fungicides to address a mold or mildew problem. There is a potential that one or more chemical pesticide used at one or more of these facilities might appear on the FSC Lists of highly hazardous pesticides (FSC-POL-30-001a). All pesticide applications on these excised properties will continue to follow all federal, state, and local laws. No pesticide application described above is expected to have any measurable impact on any forest, whether DNR-managed or otherwise.

The final two facilities proposed for excision are the Meridian Seed Orchard and Webster Nursery. These facilities constitute the agency's primary sources of tree seeds and seedlings, respectively. Neither facility is a forest, and neither is located within a forested setting. To meet the growing demand for native tree species adapted to conditions found throughout this region, the seed orchard and nursery rely on certain chemical pesticides that appear on the FSC Lists of highly hazardous pesticides (FSC-POL-30-001a). These chemicals are carefully selected, used, and monitored in a controlled agricultural environment with the goal of minimizing their use. DNR does not use pesticides from the World Health Organization 1a or 1b lists, nor does the DNR use any chemicals prohibited by federal, state, or local laws. However, given the large-scale production of millions of single-species seeds and seedlings, it is not feasible to eliminate any pest-control options. Chemical pesticides give DNR the operational flexibility necessary to grow native tree seedlings in soils that are free of disease, weed seeds, fungus, and nematodes. Conversely, research by DNR suggests that electing not to use these chemical pesticides would result in significant seedling mortality, hindering the agency's ability to promptly regenerate stands following timber harvest. The Washington DNR is not aware of any scientific data to back the notion that trace chemicals present in seedlings from nurseries have any meaningful chemical influence on the forest environment.

The excision of these nine properties will not affect DNR's ability to conform to the FSC Pesticides Policy on the remaining 99.97% of its lands within the South Puget HCP Planning Unit.

As is obvious from the attached aerial photos, the facilities proposed for excision do not include commercially harvestable forestlands. None of them meets the definition of "Forest," "Natural

FSC Forest Management Certification Surveillance Audit Report Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

Forest,” or “Plantation” as defined in the FSC Glossary of Terms (FSC-STD-01-002, Updated October 2017).

Excised Facilities

1. Belfair Work Center, located at 3430 NE Sandhill Road outside Belfair, Washington. The excised area includes a total of 1.6 acres of “forest-managed” land within the South Puget HCP Planning Unit. The excised area comprises a gravel driveway and parking lot, an equipment storage area, and a small office building (see attached aerial photo).
2. Mineral Work Center, located at 2510 State Route 7 in Mineral, Washington. The excised area includes 1 acre of non- “forest-managed” land. The excised area includes a parking lot and small office building (see attached aerial photo).
3. North Bend Work Center, located at 902 SE North Bend Way in North Bend, Washington. The excised area includes 0.7 acres of non- “forest-managed” land outside of the South Puget HCP Planning Unit. The excised land includes an office building and parking lot (see attached aerial photo).
4. Port of Shelton Work Center, located at 414 W Business Park Road in Shelton, Washington. The excised area includes 0.9 acres of non- “forest-managed” land within the South Puget HCP Planning Unit, and it consists of an office building and parking lot (see attached aerial photo).
5. South Puget Sound Region Office, located at 950 Farman Avenue North in Enumclaw, Washington. The excised area includes 3.3 acres of non- “forest-managed” land within the South Puget HCP Planning Unit, and it consists of an office building, several outbuildings, a courtyard, and two parking lots (see attached aerial photo).
6. Tacoma Work Center, located at 1517 Fawcett Avenue in Tacoma, Washington. The excised area includes 1.5 acres of non- “forest-managed” land within the South Puget HCP Planning Unit, and it consists of an office building and parking lots (see attached aerial photo).
7. Tumwater Compound, located at 801 88th Avenue Southeast in Tumwater, Washington. The excised area includes 28.3 total acres, of which 18.7 acres are “forest-managed” lands within the South Puget HCP Planning Unit. The excised area includes multiple office buildings, warehouses, storage facilities, parking lots, lawns, and courtyards (see attached aerial photo).
8. Meridian Seed Orchard, located at 6425 Meridian Road SE in Lacey, Washington. The excised area includes 110.4 total acres, of which 26.7 acres are “forest-managed” land within the South Puget HCP Planning Unit. The excised area includes several agricultural-style fields of seedlings and seed-source trees, dirt roads, equipment storage buildings, and offices (see attached aerial photo).
9. Webster Nursery, located at 9805 Blomberg Street SW in Olympia, Washington. The excised area, which lies entirely outside of the South Puget HCP Planning Unit, includes 268.8 total acres, of which 23.7 acres are identified as “forest managed” lands. The excised area includes

FSC Forest Management Certification Surveillance Audit Report Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

several agricultural-style fields of seedlings, dirt roads, equipment storage buildings, processing facilities, greenhouses, and offices (see attached aerial photo).

Screen for “Controversial” Areas

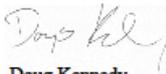
The following statements are equally true for each of the nine sites proposed for excision under the FSC Policy on the Excision of Areas from the Scope of Certification (FSC-POL-20-003).

- i. DNR staff and contractors will continue to recognize and respect all **traditional and civil rights** on these and all DNR-managed lands and facilities.
- ii. None of the nine facilities proposed for excision are collocated with the following **high conservation values (HCVs)**: species diversity; landscape-level ecosystems and mosaics; rare, threatened, or endangered ecosystems and habitats or refugia; critical ecosystem services; sites and resources fundamental for satisfying the basic necessities of local communities or Indigenous Peoples; or cultural values. The proposed facilities do not encompass any actual forest, HCV or otherwise.
- iii. None of the excised areas are within **Endangered Forest areas**.
- iv. DNR is not engaged in planting **genetically modified trees** at any of the nine sites proposed for excision.
- v. No **illegal harvesting** is taking place at any of the nine proposed sites.
- vi. Since the facilities proposed for excision do not include any “natural forests,” these sites are in no danger of **conversion** from natural forest to plantations or non-forest uses.

Following the excision of these nine facilities, DNR’s FSC-FM certificate will cover 176,160 acres (176,207 - 47). We will manage our forestlands in the South Puget HCP Planning Unit in accordance with the new FSC Pesticide Policy, and no logs or other forest products from outside the certified area will be identified as having come from an FSC-certified forest.

Please direct all questions or comments to the point of contact for Washington DNR’s Forest Certification Program, Doug Kennedy, 360-902-1283, douglas.kennedy@dnr.wa.gov.

Sincerely,



Doug Kennedy
Forest Certification Program Manager
Washington Department of Natural Resources

FSC Forest Management Certification Surveillance Audit Report

Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit

Name	Address	PLSS	HCP Unit	Acres	Forest- managed Acres
Belfair Work Center	3430 NE Sandhill Rd, Belfair, WA 98528	T23-0N R1-0W S18	S. PUGET	1.6	1.6
Meridian Seed Orchard	6425 Meridian Rd SE, Lacey, WA 98503	T17-0N R1-0W DLC43	S. PUGET	110.4	26.7
Mineral Work Center	2510 State Route 7, Mineral WA 98355-9712	T14-0N R5-0E S17	S. PUGET	1	0
North Bend Work Center	902 SE North Bend Way, Bldg 7, North Bend WA 98045	T23-0N R8-0E S10	N. PUGET	0.7	0
Port of Shelton Work Center	414 W Business Park Rd ,Shelton, WA	T20-0N R4-0W S02	S. PUGET	0.9	0
South Puget Sound Region Office	950 Farman Ave N, Enumclaw WA 98022	T20-0N R7-0E S30	S. PUGET	3.3	0
Tacoma Work Center	1517 Fawcett Ave, Tacoma WA 98402	T20-0N R3-0E DLC38	S. PUGET	1.5	0
Tumwater Compound	801 88th Avenue SE, Tumwater, WA 98501	T17-0N R2-0W S14	S. PUGET	28.3	18.7
Webster Nursery	9805 Blomberg St SW, Olympia, WA 98512	T17-0N R2-0W S20, T17-0N R2-0W S17	S. COAST	268.8	23.7
				416.5	