

FSC CERTIFICATION SYSTEM

PUBLIC SUMMARY REPORT

FOREST MANAGEMENT CERTIFICATION

Last update date: 28th February 2012

Washington State Department of Natural
Resources

South Puget HCP Planning Unit

Forest location(s): USA, Pacific Coast,

Manager office address: 1111 Washington St. SE

Postal code: 47016 - Town: Olympia, Washington - Country: USA

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Initial audit date: from June 25 to 28, 2007

Last audit (surveillance): from 4 to 7 October 2011

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1 - Description of the applicant forest entity

1.1 - General description and identification

Forest manager(s) name: Washington State Department of Natural Resource

Address: 1111 Washington St. SE

Postal code: 47016

Town: Olympia, Washington

Country: USA

Legal status: government agency

Legal Identification code: code

Telephone: 360-902-2896

Fax: 360-902-1789

e-mail: lislie.sayers@dnr.wa.gov

Web site: www.dnr.wa.gov.

Employees number: 1,200 (statewide)

Annual turnover: 236,500,000 US\$

President of the Forest Management company: Mr. Doug Sutherland.
Commissioner of Public Lands

Manager of the Forest Management company Ms. Gretchen Nicholas

Contact person (responsible for FSC certification): Ms. Lislie Sayers

Conversion Rates: 1 acre = .404688 hectares, 1mbf = 5.12825051 m3

Activity

Type: forest management

Detailed activity: The Washington State Department of Natural Resources (WADNR) manages state forest lands for a variety of public trusts which fund statewide school construction, universities, state institutions, and county services. Forest management is directed by the Policy for Sustainable Forests, and WADNR's Habitat Conservation Plan (HCP), a contractual agreement with the Federal Services (United States Fish & Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries) 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 WADNR 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 and camps. 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.



As already stated, the WADNR manages state lands in trust for a number of public entities. This is a fiduciary relationship, which requires that WADNR manage its forest lands to optimize the economic value to the trusts, with undivided loyalty. The relationship does not in any way relieve the agency from abiding by the HCP, Federal and State Laws, and the Forest Practices Act. The balance of fiduciary, environmental and economic goals is determined by the Board of Natural Resources (BNR) and the beneficiaries.

The Commissioner of Public Lands is an elected official of the State who is responsible for all aspects of public lands managed by WADNR. Managers, supervisors and staff work to achieve the goals of WADNR. A central headquarters in Olympia directs the policy, planning and enforcement aspects of WADNR's mandate. Regional offices direct operations, plan and perform on-the-ground activities.

Forest owner name: The State of Washington

Address: 1111 Washington St. SE
Postal code: 47016
Town: Olympia, Washington
Country: USA
Legal status: government agency
Legal Identification code: code
Telephone: 360-902-2896
Fax: 360-902-1789
e-mail: lisliesayers@dnr.wa.gov
Web site: www.dnr.wa.gov

Employees number: 1, 200 (total) 103 (certified area)
Annual turnover: 236,500,000 US\$
Detailed activity: Multiple Use Land Management

The forestlands are owned by the State of Washington. As public forestlands permitted land uses include forest management, habitat conservation, a complete range of recreational uses, hunting, fishing, non-timber forest products extraction (e.g. transmission towers, mushroom collection, decorative bough gathering), and mineral extraction. Use rights are available to the general public for non-consumptive recreational activities at no cost while permits are required for extractive uses.

The South Puget HCP Planning Unit is one of nine state land planning units. It is the first unit to be audited for FSC certification because it is the first area to undergo Forest Land Planning. The State is committed to FSC certification of all its lands over time as Forest Land planning is completed in the other regions.

1.2 - Forest population(s) description

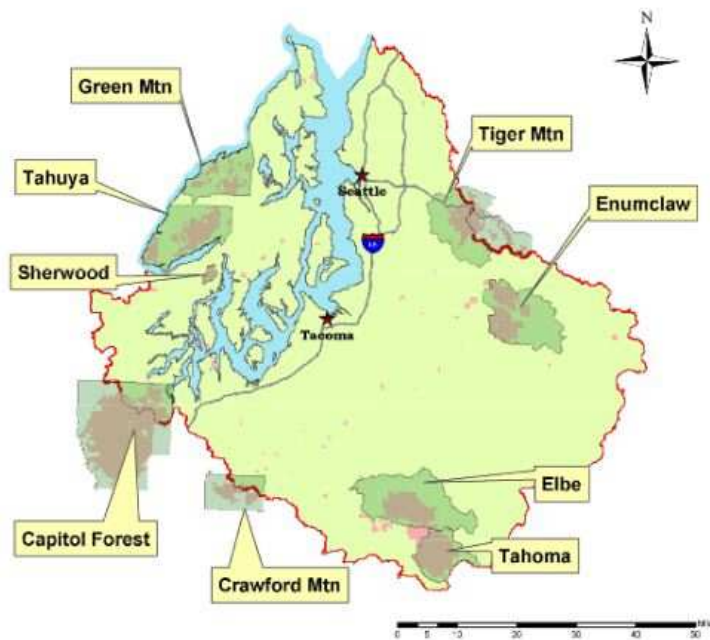
The South Puget HCP Planning Unit is located in west central Washington. It stretches from the cities of Everett in the north to Olympia in the south. The counties and parts of counties in this planning unit that contain DNR-managed lands are southern King, Pierce, eastern Thurston, north-central Lewis, Kitsap, and eastern Mason. The Cedar, Green, White, Carbon, Puyallup, Nisqually, and Deschutes rivers are also included in the planning unit. The Planning Unit



encompasses the cities of Seattle and Tacoma and is the most populous part of Washington State.

Map1 shows the Planning Unit as the area inside the red line. The boundaries of the Planning Unit are based on biophysical attributes determined by a Habitat Conservation Plan (1997). Within the Planning Unit there are approximately 144,630 acres (58,532 hectares) of DNR-managed forested state trust lands, which are organized into nine landscape blocks (shaded areas of Map 1).

MAP 1 South Puget HCP Planning Unit



Forest(s) description

Forest zone: **temperate**

List of main commercial timber and non-timber species included in the intended scope of certificate (botanical name and common trade name):

Douglas Fir – *Psuedotsuga menziesii*

Red Alder – *Alnus rubra*

Western Redcedar – *Thuja plicata*

Western Hemlock – *Tsuga heterophylla*



Pacific Silver Fir – *Abies amabilis*

Dominating forest stand composition: softwood

Location of the forest:

- Latitude E/W: 47 degrees 13 minutes
- Longitude N/S: 122 degrees 28 minutes

Total audited forest area: 58,530 ha (144,630 ac), which is:

- privately managed: 0 ha
- state managed: 58,530 ha (144,630 ac)
- community managed: 0 ha
- timber production forest: 58,530 ha (**144,630 ac**)
 - classified as "**plantation**": 0 ha
 - regenerated primarily by **replanting** or by a combination of replanting and coppicing of the planted stems: 753 ha (1,861 ac) /year
 - regenerated primarily by **natural regeneration**, or by a combination of natural regeneration and coppicing of the naturally regenerated stems: 0 ha
- forest and non-forest land protected from commercial harvesting of timber and managed primarily for
 - conservation objectives: 4, 364 ha (10,784 ac.)
 - the production of NTFPs or services: Lease Area 250 ha (617 ac)
- forest classified as "high conservation value forest": 31, 652 ha (78,100 ac) (HCP affected areas)

List of high conservation values present in the South Puget HCP Planning Unit:

- Northern Spotted Owl Habitat
- Marbled Murrelet Habitat
- Salmon-occupied Rivers
- Bald Eagle Habitat
- Peregrine Falcon Habitat
- Gray Wolf Habitat
- Aleutian Canada Goose Habitat
- Old growth forests
- Riparian and wetland areas containing rare plants and communities
- Uncommon habitats including; balds, cliffs, caves, talus, oak woodlands, mineral springs, snags and structurally unique trees

List of chemical pesticides used within the forest area, and reason for use:



- Triclopyr, Glyphosate, Imazapyr, Sulfometuron – vegetation control in regenerating sites

List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products: WADNR forestlands provide roundwood timber through a competitive bidding process.

1.3 - Forest management system and plan description

Forest Land management on forested state trust lands in Washington is conducted under a hierarchy of policies and plans. The Policy for Sustainable Forests provides overall strategic direction to forest management by providing policies in four areas: Economic Performance, Forest Ecosystem Health and Productivity, Social and Cultural Benefits, and Implementation. There are a total of 23 policies, which WADNR implements. The WADNR implements a Habitat Conservation Plan (HCP) to protect threatened and endangered species. WADNR's HCP is a contractual agreement with the Federal Services (United States Fish & Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries) to provide conservation benefits to these species within the range of the northern spotted owl. WADNR's HCP is a multiple species plan; however, conservation strategies are focused on the northern spotted owl, marbled murrelet, salmonid species, and other federally listed species. The HCP provides strategic and tactical direction on the management of timberlands and affects more than 75% of DNR-managed forested state trust lands and treats a portion of them as High Conservation Value Forests. Under the HCP are tactical level plans (Forest Land Plans) at the HCP Planning Unit scale (such as South Puget) which refine the attainment of strategic goals (harvest and revenue levels, habitat conservation targets) with forest management strategies more a tuned to local conditions.

Forestry principles: In the uplands, even-aged management, harvest ages 40 to 80 years, silvicultural prescriptions are set for each harvest area and include harvest, renewal, tending, thinning and monitoring requirements. In the riparian areas, these are managed under uneven-aged.

Implementation and objectives of the system: The silvicultural system employed by WADNR is efficiently implemented and tracked. A management information system (Planning and Tracking (P&T)) is used to set prescriptions and track their implementation. The objective of each silvicultural system is to efficiently and effectively manage forest habitats in accordance with the HCP while maximizing revenues to the beneficiary trusts.

Efficiency regards to the forest history:

The Forest Land management plan for the South Puget HCP Planning Unit defines the management objectives for the area, defines the resources in the Planning Unit, identifies and rationalizes the operational prescriptions being employed. On-the-ground activities are determined in the harvest plans developed through the Planning & Tracking system. The objectives of the South Puget HCP Planning Unit Forest Land Plan are to:

- minimize the extent of the road network and its environmental impacts



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- achieve restoration of high quality aquatic habitat to aid in federally listed salmon species recovery efforts, and to contribute to the conservation of other aquatic and riparian obligate (dependent) species
- ensure perpetual revenues to the trusts
- identify and offer a mix of special forest products to take advantage of existing markets and market value fluctuations based upon the condition of the forest understory
- improve the value of trust lands, increase their income potential, and reduce financial risks to the trusts by diversifying the land base, both among and within each asset class
- actively manage towards structurally complex forest condition especially those suitable stands in the 'biomass accumulation' forest development stage, to achieve older-forest structures across 10 to 15 percent of each Western Washington HCP Planning Unit within 70 to 100 years.

The South Puget HCP Planning Unit is a conifer forest as more than 90% of the forest area is in conifer dominated forest types. Douglas Fir types are the most prevalent accounting for 71% (41,723 ha) of the total forest area, while Western Hemlock types account for 21% of the forest area. Hardwood forests are primarily red alder and account for less than 7% of the forest area. As can be seen from the table below most forest are mixtures of species (dominant species listed first).



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FOREST TYPE	Hectares	Acres
Douglas Fir	12,003	29,660
Douglas Fir Red Alder	9,053	22,370
Douglas Fir Red Cedar	1,845	4,560
Douglas Fir Western Hemlock	18,822	46,510
Non-Commercial	320	790
Red Alder	522	1,290
Red Alder Douglas Fir	3,290	8,130
Red Cedar	138	340
Western Hemlock Douglas Fir	6,228	15,390
Western Hemlock Red Alder	862	2,130
Western Hemlock Red Cedar	490	1,210
Western Hemlock Silver Fir	4,953	12,240
TOTAL	58,530	144,630

The WADNR has also introduced “cohort management” to implement even-age variable retention harvest methods in that a variety of stand attributes are retained including large woody debris, snag (habitat) trees, super-canopy trees and legacy trees. The silviculture practiced on the Planning Unit includes even-aged variable retention harvest, classic commercial thinning and variable density thinning. Prescriptions are set based upon stand and site characteristics as well as habitat requirements and strategic goals such as revenue generation. In variable density thinnings a series or variation of tree thinning densities are used to mimic natural stand density variations. These thinning prescriptions are used to remove understory trees, stimulating natural regeneration in coordination with creating small “gaps” and unthinned areas (skips) to provide northern spotted owl dispersal and nesting habitat. Harvest ages vary from 40 to over 80 years of age with the average being 60 years.

The South Puget HCP Planning Unit is organized into nine landscape blocks, which represent contiguous forest areas spread throughout the Planning Unit. Map 1 displays the various landscape blocks included in the Planning Unit. Management of the South Puget HCP Planning Unit is the responsibility of WADNR. Fifty local (region) WADNR State Lands staff are responsible for the on-the-ground activities of timber sales layout and administration, access planning and development, forest monitoring and the monitoring of activities (harvest, renewal and access). A number of activities are carried out by main (division) office staff in Olympia including forest land planning, forest inventory and GIS support. Policy development and research are developed by division staff and implemented by region staff while training is coordinated and delivered by main office personnel (division staff) so it is consistent across the State.

Qualified contractors carry out timber harvesting and road construction activities. One hundred percent of timber sales are awarded through a competitive bidding process with a portion being directly contracted to local (usually) smaller contractors. Road construction projects are normally set out for bid to qualified contractors.



WADNR is organized hierarchically with headquarters being responsible for policy, program direction, inventory and planning and the Planning Units (or regions) being responsible for silvicultural prescriptions, sale administration, compliance monitoring, and contracting operations.

WADNR has an extensive monitoring program covering forest growth and yield, forest conditions, compliance with harvest plans, implementation of the Habitat Conservation Plan, revenues from timber sales, and environmental impacts. The results of all monitoring activities are publicly available in reports such as the annual *Habitat Conservation Plan for State Trust Lands 2005 Implementation Monitoring Report*.

1.4 - Production and harvesting

The allowable cut (sustainable harvest) for the South Puget HCP Planning Unit has been recently recalculated and updated as part of the Westside Sustainable Harvest (2007). The new allowable cut is approximately 136,256 m³ (26, 570mbf) per year for all species. Annual growth in the forest without harvest is estimated to approximately 588,000 m³ per year for all species. The FY2006 harvest was 226,000 m³, (44, 070 mbf) the table below details the harvest by species. Harvest data comes from the WADNR's planning and tracking information systems which records harvest volumes for each timber sale. The significant disparity between the new allowable cut level (2007) and the 2004 harvest is due to a variety of reasons including;

- The implementation of the HCP *Riparian Forest Restoration Strategy* (RFRS) (DNR 2006). This document details methods for making site-specific forest restoration decisions in the riparian areas. In order for DNR to meet its long-term goal of riparian restoration, the RFRS established measureable benchmark targets to assess opportunities and progress toward the long-term management objective.
- The Sustainable Harvest Settlement Agreement (*WEC v. Sutherland 2006*). After the Board of Natural Resources adopted the sustainable harvest calculation (March 2004), the Washington Environmental Council (WEC) filed litigation (October 2004) seeking a declaration that Board of Natural Resources decisions on the sustainable harvest calculation were invalid on the grounds that it was adopted without proper compliance with the State Environmental Policy Act (SEPA). Subsequently, a Settlement Agreement was signed between the litigation parties which outlined specific management actions in northern spotted owl conservation areas for the planning decade (until 2014).

Volumes Harvested 2006

Species	Products	Cubic Meters	MBF	Selling Mode	FSC Type
Red Alder	Logs	9,846	1,920	Competitive Bid	Pure



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Hemlock	Logs	24,354	4,749	Competitive Bid	Pure
Douglas Fir	Logs	159,902	31,181	Competitive Bid	Pure
Maple	Logs	595	116	Competitive Bid	Pure
Silver Fir	Logs	25,328	4,939	Competitive Bid	Pure
Red Cedar	Logs	872	170	Competitive Bid	Pure
Cottonwood	Logs	2,631	513	Competitive Bid	Pure
Lodgepole Pine	Logs	2,200	429	Competitive Bid	Pure
White Pine	Logs	205	40	Competitive Bid	Pure
Spruce	Logs	67	13	Competitive Bid	Pure
Noble Fir	Logs	0	0	Competitive Bid	Pure
Grand Fir	Logs	0	0	Competitive Bid	Pure
Total		226,000	44,070		

For all Species (in cubic meters of round wood)

Approximate annual biologic production: 588,000 m³

Approximate intended harvesting volume 2007-2017 (annual allowable cut (AAC)): 136,256 m³ (26, 570 mbf)

Approximate FY2006 harvest level volume: 226,000 m³ (44, 070mbf)

Approximate annual harvesting rate (AAC / total available volume):

Approximate annual commercial production of non-timber forest products included in the audit scope, by product type: Transmission & Wind Towers, Salal, Boughs revenue \$1,000,000.

Allowable cuts in the state of Washington are assessed using mathematical programming models which optimize available harvest levels based upon constraints for future forest conditions, habitat availability and financial resources. Allowable cuts are based on sustainable harvest units which are grouped by trust (see WADNR Policy on definition of sustainability for the sustainable harvest calculation). The following table presents the allowable cuts for the ten forest types on the South Puget HCP planning area.



Averaged Annual Allowable Cut 2007-2017

Forest Type	Cu.Meters	MBF
Douglas Fir	29,590	5,770
Douglas Fir/Red Alder	25,590	4,990
DF Douglas Fir RC	12,308	2,400
Douglas Fir/Western Hemlock	43,436	8,470
Red Alder/Douglas Fir	4,154	810
Red Cedar	103	20
Western Hemlock/Douglas Fir	12,205	2,380
Western Hemlock/Red Alder	462	90
Western Hemlock/Red Cedar	821	160
Western Hemlock/Silver Fir	7,590	1,480
Total	136,256	26,570

Timber estate models are developed from the state wide forest inventory and growth and yield data collected by the WADNR. Forest state variables are modelled along successional pathways which vary, by forest type, age, and silvicultural treatment (e.g. planted, natural, thinnings, clearcuts). The initial allowable cut was established based upon an aggregate analysis of the Westside WADNR-managed forested state trust lands which discretely included the Planning Unit within it.

1.5 - Certification application type

Type of certificate: Single FMU

Total number of FMUs in the certificate scope: 1

Number of FMUs and forest area in scope that are:

less than 100 ha: 0 FMU that is 000 ha;

from 100 to 1000 ha: 0 FMU that is 000 ha;

from 1000 to 10 000 ha: 0 FMU that is 000 ha;

more than 10 000 ha in area: 1 FMU that is 58,530 ha (144,630 ac).

meeting the eligibility criteria as SLIMF: 0 FMU that is 000 ha.



2 - Legal, administrative and land use context

State forested trust land management is carried out within the framework of state and federal laws, the state constitution and the Enabling Act, DNR's 2006 Policy for Sustainable Forests, 1997 Habitat Conservation Plan (HCP), Sustainable Forest Management including the Sustainable Harvest Level, and with oversight and policy direction provided by the Board of Natural Resources. DNR also follows current Washington State Forest Practices rules (WAC 222).

The Forest Practices Board was established by the State Legislature under the 1974 Forest Practices Act (RCW 76.09). The Forest Practice Rules (WAC 222) give direction on how to implement the Forest Practices Act. The Act regulates activities related to growing and harvesting timber on all non-federal forestlands in the state, including DNR-managed forested state trust lands.

The Endangered Species Act's purposes are to protect the ecosystems that threatened and endangered species depend upon, to provide a program for the conservation of threatened and endangered species populations, and to take appropriate steps to achieve the purposes of the Act (16 U.S.C. 1531 et seq.).

On state lands in the State of Washington there are few tenure rights provided to the public. Timber is sold primarily through a public auction system, which provides stumpage buyers a limited term to harvest timber.

3 - Other activities

3.1 - Description of the activities

Washington DNR manages the trust lands for multiple use. The Planning Unit supports a wide range of recreational (e.g. hiking, fishing, camping) activities as well as non-timber forest products. The land leased for agricultural use and communications towers provides a significant amount of non-timber revenue as does aggregate extraction. Bough collection is a growing business as well.

3.2 - Potential Impact on forestry

Most of the above activities remove land from the "forestry" land base, though most are less than one acre in size. The withdrawal of these lands will reduce the amount of both habitat and timber the Planning Unit can supply.



A. Main audit

4 - Base of evaluation

4.1 - Composition of the audit team

- Lead auditor:**
- Brian Callaghan RPF CEA(SFM), FSC FM qualified lead auditor on behalf of Bureau Veritas Certification.
- Auditors:**
- Vincent Carrao CF , FSC qualified auditor on behalf of Bureau Veritas Certification.
 - Greg Bassler, FSC qualified auditor on behalf of Bureau Veritas Certification.
 - Jack Ward, FSC qualified auditor on behalf of Bureau Veritas Certification.
 - Craig Howard RPF CEA(SFM), FSC qualified auditor on behalf of Bureau Veritas Certification, also qualified as an auditor by Smartwood.
 - Gary Machlis PhD, technical (social-ecologist) expert on behalf of Bureau Veritas Certification.
 - Martin Vaughn, technical (wildlife biologist) expert on behalf of Bureau Veritas.

(cf. CV of the audit team members, appendix A).

4.2 - Previous audits

In the fall of 2000 a certification assessment was conducted on the Westside Trust Forestlands (which includes South Puget HCP Planning Unit) by Scientific Certification Systems (SCS). Certification was recommended along with 27 conditions. WADNR did not pursue certification at that time.

In the fall of 2003 an “update evaluation” was undertaken by SCS of the Westside forests. This audit resulted in one major corrective action and nine minor corrective actions. Certification was offered but declined by the WADNR. In the 2003 SCS update evaluation report ten corrective action requests were issued. The 10 CARs are listed below with the audit teams findings, as can be seen a great deal of progress has been made since the issuance of the 2003 SCS report.

1. Major. To prepare and make progress in implementing HCVF action plan. WADNR has well established programs which identify and manage high conservation value forests. The Habitat Conservation Plan (HCP), the Natural Resource Conservation Areas and the Natural Area Preserves programs were all developed and implemented within a framework of public consultation. The audit team was satisfied that these programs meet the intent of HCVFs.

2. Minor. Develop structured social impact assessment protocols. – A CAR was issued to develop social impact assessment



3. Minor. Complete a sustainable harvest re-calculation process – revised harvest level recalculation was completed in 2007 and incorporated in the South Puget Forest Land Plan.
4. Minor. Institute a transparent, well-documented, iterative and reasonable decentralized landscape planning process – Landscape planning has been incorporated into the Forest Land Planning Process which is applied at the planning unit level rather than the regional level.
5. Minor. Develop an update to the 1992 Forest Resource Plan.- In 2006 the state released its Sustainable Forests Policy which set strategic objectives and strategies for forest management of state trust lands.
6. Minor. Develop and begin to implement a comprehensive monitoring protocol ... including social impacts and the extent the management plan is being properly implemented. - Monitoring of social impacts is subject of a CAR, all other aspects of monitoring were found to be adequate.
7. Minor. Develop a summary of monitoring activities – WADNR focuses on research and monitoring to identify and eliminate the information barriers to full HCP implementation and improve the ability to meet management goals through adaptive management. Monitoring and research provide information on how well actions or plans are working. The information gained can then be used to adapt management practices as needed. A summary of these monitoring activities are outlined in WADNR's HCP Annual Report to the Federal Services and is available at WADNR website www.dnr.wa.gov
8. Minor. Design and document a CoC control system. – The auditors found that current practices of documenting timber sales and individual loads of timber adequate for the purposes of CoC.
9. Design and implement a public consultation process for HCVFs. – WDNR has undertaken extensive consultations for the HCP and other conservation initiatives. In the past four years extensive consultations have been undertaken for the Sustainable Forest Policy, the AAC recalculation (Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington) and the forest land plan. Additionally, significant targeted consultation and negotiations have been undertaken with the most influential interest groups.
10. Design and implement an HCVF monitoring program. – the HCP monitoring program is extensive and described as “excellent” by the US Fish & Wildlife Service.

The South Puget HCP Planning Unit is certified under SFI(r) program and has had both a certification audit and surveillance audit within that system.

4.3 - Forest management referential used for the initial audit

For this initial audit, we referred to the checklist (ref. FSC PCUS verification checklist) extracted from the forest management referential Pacific Coast USA (Ref. Pcwg_9.0_NTC.pdf).

This last version is available on the website www.fscus.org or on request to Certification Body.

Filled in checklists of the auditors are available in Appendix C.

4.4 - Referential adaptation and stakeholders comments



No adaptation was necessary because regional standard (Pacific Coast USA) from FSC US was applied as published.

5 - Information collecting modalities

5.1 - Description of the audit program

The audit was undertaken from June 25 to 28, 2007. The audit included two days of field visits examining more than 20 sites (e.g. harvest, renewal, old growth, protected areas). Two members of the audit team participated in a three hour fly-over of the South Puget HCP Planning Unit to gain a landscape perspective of the area. Meetings were held with a variety of interest groups (stakeholders) and a public meeting was held on the evening of June 26 where members of the public provided input to the auditors. Opening and closing meetings were held in the WADNR building in Olympia.

June 25, 2007

WADNR Olympia	08:30	Audit Team Arrival
	09:00	Opening meeting of the initial audit in presence of Gretchen Nicholas; Land Management Division Manager, Lislie Sayers; Certification Coordinator, Tami Makita; Land Management Division Assistant Manager (Ecosystems Services Manager), Allen Estep; PSF / Certification Program Lead, Jim Hotvedt; Lead Scientist, Jed Herman; Product Sales and Leasing Division Manager, Dennis Carlson; SPS Assistant Regional Manager, Angus Brodie; Land Management Division Assistant Manager (Data Stewardship Manager), Pete Holmberg; Land Management Division Assistant Manager (Silviculture and Regeneration), and Farra Vargas; Project Manager
	10:00	Document review & Staff Interviews
	13:00	Howard & Bassler Over-flight of South Puget HCP Planning Unit
	13:00	WADNR Staff Interviews Corrao, Ward, Callaghan, & Machlis
	17:30	Daily Wrap Up meeting with Gretchen Nicholas and Lislie Sayers

June 26, 2007

Location	08:00	Ward & Howard – Tahuya Field Sites (all day)
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	08:00 Bassler, Corrao, Vaughn – Tahoma and Lookout Field Sites (all day)
Seattle	10:00 Callaghan & Machlis – Meeting with Washington Environmental Council
Olympia	13:00 Callaghan & Machlis – American Forest Resource Council
	17:00 Daily Wrap Up meeting with Gretchen Nicholas and Lislle Sayers
Tacoma	19:00 Callaghan, Corrao, & Machlis – Public Meeting/Openhouse

June 26, 2007

	08:00 Corrao, Ward & Machlis – Tiger Mountain Field Sites (all day)
	08:00 Bassler, Howard, & Vaughn – Enumclaw Sites (all day)
Seattle	10:00 Callaghan– Meeting with Washington Trails Association
Seattle	13:00 Callaghan– Tiger Mountain Advisory Committee,
Olympia	17:00 Daily Wrap Up meeting with Gretchen Nicholas and Lislle Sayers

June 27, 2007

Olympia	09:00 Auditors undertake interviews, information collection, document review to finalize findings and conclusions.
	10:00 Callaghan visits land titles and registry departments to confirm land ownership.
	02:00 Auditors meeting to discuss findings, corrective action requests and recommendations.
	04:00 Closing meeting with Jed Herman, Gretchen Nicholas, Bruce Mackey; Lands Steward, Dennis Carlson, Farra Vargas, Lislle Sayers, Tami Miketa, Jim Hotvedt, and Allen Estep.

The audit process required a total of 38 “person-days” to conduct. Six days were required for a pre-audit in Jan/Feb 2007, 5 days for consultation, 20 days for auditors during the registration audit, and 7 days for two technical experts.

5.2 - Documents review

Policy for Sustainable Forests (2006), WADNR (1997) Final Habitat Conservation Plan, Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington

In addition, a complete list of documents reviewed is presented in Appendix E.



5.3 - Interview(s) of involved people met

WADNR Staff:

- Ms. Lislle Sayers Certification Coordinator
- Ms. Gretchen Nicholas, Land Management Division Manager
- Mr. Allen Estep, PSF / Certification Program Lead
- Mr. Angus Broie, Land Management Division Assistant Manager (Data Stewardship)
- Mr. Jon Tweedale, Product Sales and Leasing Assistant Division Manager
- Mr. Jed Herman, Product Sales and Leasing Division Manager
- Ms. Tami Miketa, Land Management Division Assistant Manager (Ecosystem Services)
- Mr. Dennis Carlson, Assistant Regional Manager South Puget Sound
- Ms. Farra Vargas, Project Manager
- Mr. Ted Keeley, Natural Resource Specialist South Puget Sound
- Mr. Alan Mainwaring, Biologist South Puget Sound
- Mr. Keith Yonaka, Regional Engineer Pacific Cascade Region
- Mr. Mark Thibo, Assistant Regional Manager South Puget Sound
- Mr. Joe Brady, Natural Resource Specialist
- Ms. Ana Shafer, Regional Geologist Pacific Cascade Region
- Ms. Susan Seaberg, RMAP Engineer South Puget Sound
- Mr. Jerry Kvale, Natural Resource Specialist South Puget Sound
- Mr. John Fisher Silviculturalist South Puget Sound

-Sub-contractors:

- Mr. John Mattson and Blair Stain, Precision Logging
- Mr. Dave Johnson, North Fork Logging



5.4 - On-site visit(s)

Site visits were undertaken over two days with two separate field parties examining sites throughout the South Puget HCP Planning Unit. Site selection was made prior to the audit with selection systematically covering a variety of land uses, forest types and forest operations. One quarter of the field sites were chosen randomly. Sites were selected from each of the landscape blocks areas in the planning unit, additionally sites were selected based upon the silvicultural activities which have occurred on them. The following table presents the individual sites visited during the audit along with a brief description of the activities/attributes found on each site.

FMU ID	Forest	Sale/Site Name	Acres	Description
25931	Elbe Hills	Betty Beaver	18	Regeneration harvest 2005, plant 2007, dispersal habitat, water quality
25932	Elbe Hills	Red Heckle U1	59	Regeneration harvest 2006, plant 2007, dispersal habitat
43508	Elbe Hills	Gobbler U4	61	Regeneration harvest 2005, plant 2007, dispersal habitat
64001	Tahoma	Look Out PC U1	138	Thin 2005, plant 2006 6ac, dispersal habitat
45400	Tahoma	Hud Cap PC U1	243	Thin 243, plant 3, dispersal habitat
NCRA	Tahoma	Tahoma Forest NCRA	230	Natural Resource Conservation Area - Old Growth Forest Douglas Fir
NCRA	Tahoma	Town of National NRCA		Natural Resource Conservation Area
16814	Tahuya	Square Plot U1	84	Regeneration harvest 2006, plant 2007
16813	Tahuya	Shoo	99	Regeneration harvest 2005 plant 2006,
16805	Tahuya	Square Plot U2	46	Regeneration harvest 2006, plant 2007
15560	Tahuya	Elf Hurd	71	Regeneration harvest 2000, plant 2002, tend 2006, water quality
13429	Tahuya	Hurd Ridge U1	19	Plant 1989, Pre-commercial thin 2006
17443	Green Mnt	Popcorn 1	50	Plant 91, Pre-commercial thin 2006, water quality
41750	Hood Canal	Miller x3 U3	10	Regeneration harvest 2006, plant 2007
41047	Hood Canal	Miller x3 U4	57	Regeneration harvest 2006, plant 2007
41019	Hood Canal	Yam U4	86	Regeneration harvest 2005, plant 2007, water quality
26089	Hood Canal	Tenas Two U1	72	Regeneration harvest 2006, plant 2007
23250	Hood Canal	Side Saddle	93	Regeneration harvest 99, plant 01, veg 03, herb 04, hand cut 2006
NAP		Kitsap Forest NAP	572	Natural Area - old growth douglas fir and western hemlock
47989	McDonald	Rapscallion	58	Regeneration harvest 2006, plant 2007
31702	Grass Mnt	Sweet Emotion	15	Pre-commercial thin 2006 - dispersal habitat
23464	Grass Mtn	5427-P	105	Pre-commercial thin 2004, pre-commercial thin 2006, dispersal habitat
13270	Grass Mnt	Coal Mountain	68	Regeneration harvest 87, plant 87, pre-commercial thin 2006
45379	Sherwood	Lookout PC U1	349	Thin 2006, Dispersal Habitat
45039	Sherwood	Lookout PC U1	165	Thin 2006, plant 14 ac 2006, Dispersal Habitat
16809	Sherwood	Double Cut	99	Regeneration harvest 2006, plant 2007



5.5 - Stakeholders identification and consultation

Stakeholders were first identified during a pre-audit consultation on February 2 2007, then formally consulted prior to the initial audit via an e-mail notification and survey. Notification of the certification audit and an invitation to participate in it was sent out by e-mail to 555 individuals and groups. This letter included a short survey on Washington DNR's forest land management program and their public consultation efforts. Fifteen survey responses were received. In response to questions on public consultation the WADNR received responses of Good or Excellent from the majority respondents. In relation to the protection of high conservation value forests the responses were similarly positive. The following table summarizes the results of our survey.

Question	Awful	Poor	Adequate	Good	Excellent
How would you rate the Washington DNRs efforts to undertake public consultation ?	0	0	2	9	4
How would you rate the Washington DNR efforts to protect natural areas and high conservation value forests in the South Puget HCP planning Unit?	0	0	2	7	6
How would you rate the Washington DNR's efforts to protect providing economic benefits within the South Puget HCP Planning Unit?	0	0	4	7	4

The thirteen aboriginal tribes in the area were contacted by both phone and email to setup consultations with each. Only one tribe (the Cowlitz) was available to discuss forest management with us. The Cowlitz tribe has very good relations with WADNR and had no concerns with the WADNR seeking FSC certification. Additionally, the Snoqualmie Nation submitted a survey response.

During the audit, meetings were held with twelve stakeholder groups in response to their requests, which resulted from our invitation to participate. All stakeholder groups were content with WADNR's seeking FSC certification. Environmental groups were somewhat skeptical of WADNR and the new arrangement they have forged as part of the 2006 Settlement Agreement. The forest industry groups are in favor of FSC certification for WADNR though they are concerned that more economic benefits could be derived from the forest as the allowable cut is being held below forest growth. Recreational groups were pleased with the treatment they have received from WADNR.



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We received comments prior to the initial audit from the following people:

- Mr. Tommy Thomson, BCMC Motorcycle / NMA Recreation
- Mr. Cindy Sands, Paralegal, WA State School Directors Association Beneficiary
- Mr. Larry Istvan, Tiger Mountain Advisory Committee Conservation
- Mr. Will Hamilton, Consultant, Hamilton Resources Management, Inc., Settlement Partner
- Mr. Doug Schrenk, Snoqualmie Nation, Tribal
- Mr. Doug Newlands, King County DNR Biosolids, Government
- Mr. David St. John, King County DNRP
- Mr. Mike Lyall, Cowlitz Tribe
- Ms. Karen Sterr, consultant
- Dr. Robert Rhubes, SCS, Certifier

** During this audit we interviewed the following people:

- Mr. Bill Pickel, Washington Loggers Association, Forest Industry
- Ms. Nina Carter, Executive Director, Washington Audubon, Settlement Partner
- Mr. Ian Hanna, Northwest Natural Resources Group, FSC Certification
- Mr. Will Hamilton, Consultant, Hamilton Resources Management, Inc., Settlement Partner
- Ms. Becky Kelley, Washington Environmental Council, Settlement Partner
- Dr. Eric Harlow, Washington Forest Law Center, Settlement Partner
- Dr. Gordon Bradley, Tiger Mountain Advisory Committee
- Mr. Jonathon Guzzo, Washington Trails Association, Recreation
- Ms. Elizabeth Lunney, Washington Trails Association, Recreation
- Mr. Bob Dick, America Forest Resource Council, Forest industry, Settlement Partner
- Mr. Joe Scott, Conservation Northwest, Conservation
- Mr. Mark Ostwald, US Fish and Wildlife Service
- Mr. Matt Longenbaugh, National Oceanographic and Atmospheric Agency (NOAA) Fisheries

5.6 - Other evaluation techniques

On the afternoon of June 25th two auditors took an over-flight of the SP Planning Unit. The flight included aerial reconnaissance of all areas to be visited on the ground, as well as inaccessible sites.



5.7 - Initial audit closing meeting

A closing meeting was held on the afternoon of June 28th in the boardroom of the WADNR offices in Olympia Washington. At this meeting the audit team's findings were presented. These included six minor corrective actions and four recommendations, which would improve forest stewardship. Next steps in the certification approval process were also discussed.

6 - Audit team observations

The audit team was extremely impressed with the forest management program being implemented on the South Puget HCP Planning Unit. The information support infrastructure (e.g. forest inventory, planning & tracking, GIS) is leading edge and extremely effective. Implementation of the HCP is an outstanding example of HCVF management on a very broad scale. The care with which operations are undertaken was obvious from field visits, as was the extensive monitoring programs undertaken by WADNR personnel.

6.1 - Evaluation results with reference to the FSC referential / standard

6.1.1 - Principle 1 – Compliance with laws and FSC Principles

WADNR is in compliance with all applicable laws and regulations. The Department carries out a variety of compliance monitoring activities, related to both the HCP and the State Forest Practices Act. WADNR restricts and controls access to State lands when necessary using road abandonment, gates and signs. Illegal logging has not been a significant problem on the South Puget Planning Unit.

WADNR has shown its commitment to FSC Principles and Criteria by announcing its commitment to the Board of Natural Resources and stating its commitment publicly.

No Corrective Action Requests were made against this principle.

6.1.2 - Principle 2 – Tenures, use rights and responsibilities.

The WADNR has clear title to the state trust lands, with title deeds and survey records being stored in its Olympia office. On individual timber sales, the parcel boundaries are established by a cadastral survey. 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 respect traditional use rights.

No Corrective Action Requests were made against this principle.



6.1.3 - Principle 3 – Indigenous people’s rights

Thirteen Indian tribes were contacted during the audit, only one tribal representative was able to talk to the auditors. The Cowlitz Indian Tribe, contact was Mike Lyall. He stated they are pleased with the notifications the WADNR sends out and the management of their lands is excellent. WADNR does not operate on land under current Native American tribal control. WADNR undertakes cultural heritage surveys to determine if native values are present on state trust lands being operated upon.

WADNR has a tribal relations program that includes biennial summit meetings with all the tribes on the Westside of the Cascades. In 2006, the Agency was awarded the “Partner of the Year” by the Nisqually Land Trust. The WADNR has a very strong relationship with aboriginal peoples.

No Corrective Action Requests were made against this principle.

6.1.4 - Principle 4 – Community relations and worker’s rights

To foster good community relations and to garner local involvement, landscape blocks (Map 1) may have focus groups, where needed, made up of local stakeholders and any member of the public that wishes to attend. These committees, along with local WADNR staff, reach out to stakeholders and solicit their help in explaining and maintaining the forest ecosystem. WADNR also participates in public education by working with local schools and interest groups about natural resource management. Finally, WADNR has an active volunteer program which helps to monitor and manage the forest.

WADNR has an extensive public consultation program that seeks public input on policies, plans and forest operations. As per the State Environmental Policy Act, public input is sought on all activities and policies which may affect the environment. All stakeholders interviewed expressed satisfaction with the consultation processes delivered by the WADNR.

WADNR is a responsible employer and public agency. Its policies meet or exceed the legislative requirements in labor relations, public health and safety, and public procurement. The WADNR follows State Labor and Industry Laws to focus on worker (and contractor) safety. WADNR provides wages and benefits that are well above average for the State. Contractors are treated fairly with the conditions of employment expressed in a valid contract. Interviews with loggers confirmed that workers earn a “Good Living”. The popularity of State timber sales also indicates that fair wages can be derived from State timber sales.

WADNR does not conduct systematic and comprehensive social impact assessment of its management actions for either the Planning Unit or DNR-wide. WADNR does simple Cost Benefit Analysis, which



does not identify social aspects such as employment, community dependency, and non-timber impacts WADNR conducts selected viewshed analyses and uses the results to plan operational activities within the Unit. This is a limited but important component of social impact assessment. A minor non-conformance (WDNR – NC3) was issued against this criterion.

6.1.5 - Principle 5 – Benefits from the forest

The South Puget HCP Planning Unit is a significant contributor to the economy with annual timber revenues of more than \$17 million and leasing revenues of nearly \$1 million. WADNR does not permit export of logs, which reinforces the local economy and favors local processes. The funds generated by resource management are distributed to a number of public trusts, which fund statewide construction of public schools, universities, prisons and other state institutions, and fund services in many counties, such as libraries, firefighting, and hospitals. The State has been expanding the economic use of its forests through a “Special Forest Products” program, which encourages economic use of non-timber forest products. The South Puget HCP Planning Unit contains significant recreational values including world-class hiking trails.

Harvest sites visited during the audit were found to be efficiently harvested with no 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 cavity trees.

The Annual Allowable Cut for the South Puget HCP Planning unit was developed based on a hierarchical analysis using a top-down iterative approach. Initially, the AAC was determined as part of an overall “Westside” AAC. With the development of the Forest Land Plan for the Planning Unit, the forest management strategies and harvest level will be examined using local knowledge and more details models. The Planning Unit harvest level was revised in 2007 to approximately 136,256 m³ per year (26,570 MBF).

One Corrective Action Request was made against this principle, in relation to indicators 5.1 & 5.6.c: Insufficient attention is given to maximization of potential stocking and growth within regeneration cuts of forest zones identified as “GEM”, General Ecological Management.



6.1.6 - Principle 6 - Environmental Impact

The Department of Natural Resources has conducted a thorough Environmental Impact Statement (EIS) of its 2006 Policies for Sustainable Forests as required by the State Environmental Policy Act (SEPA). The EIS describes ecological processes; common plants, animals, and their habitats; rare plant community types; rare species and their habitats; water resources; and soil resources. The EIS examines both the resource and management alternatives for those resources. As per SEPA, the EIS underwent significant public consultations. Similar information is provided in both the HCP and the draft Forest Land Plan for the South Puget HCP Planning Unit. All individual harvest plans must also meet the SEPA requirements.

The Habitat Conservation Plan (HCP) is a keystone document for the management of all state forest lands in the South Puget HCP Planning Unit. The HCP is a multi-species plan sanctioned by the federal Endangered Species Act with the aim of conserving 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 HCP covers a number of species, with primary focus on the northern spotted owl (*Strix occidentalis caurina*) and the marbled murrelet (*Brachyramphus marmoratus*). The HCP also covers several salmonid species in the rivers of Western Washington as well as six other species (Oregon Silverspot butterfly, Aleutian Canada Goose, peregrine falcon, bald eagle, gray wolf, and Columbian white tailed deer).

Interviews with staff during the field audit confirmed a high level of awareness of the natural processes in the forest, and the impact of management activities on those forests.

State Environmental Protection Act (SEPA) is used on all timber sales. WADNR Pre-Harvest reviews are conducted for each activity to confirm site conditions and determine environmental liabilities. WADNR annually monitors HCP compliance using combined compliance team from WADNR and the U.S. Fish & Wildlife Service. A review of site records confirmed that impacts are considered before management activities are initiated.

Physical inspection on-the-ground and by air 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 WADNR 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 direction.

Every planned harvest unit requires a SEPA review and as part of that process there is a SEPA Guidance Handbook which addresses timber



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sales. Section 3 provides guidance on completing the environmental checklist. SEPA checklist question B.4.c requires details on threatened and endangered plant species by reviewing Planning & Tracking Special Concerns reports. These reports are directly tied to the NHP database but auditors could not validate that forester/engineer consider rare plants, other than state listed T&E species. The Guidance Handbook does not specify any further review other than T&E species. Currently the WADNR SEPA Guidance Handbook does not include any S1-3, N1-3, and S1-3 rare plant communities and plant species along with WDFW PHS that are identified by Planning and Tracking Special Concerns as part of the EIS checklist for T&E species. The following non-conformance (WADNR NC4) was issued against indicators 6.2.a & 6.2.b:

The WADNR SEPA Guidance Handbook needs to be revised to be more inclusive in order to align with the Glossary for the Pacific Coast Region definitions of “rare species” and “rare plant communities”.

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, WADNR State Lands Habitat Conservation Plan, Habitat Conservation Plan Riparian Forest Restoration Strategy, Procedures on Silviculture Prescriptions, and SPS Prescription Summaries.

WADNR policy requires that for each HCP Planning Unit that the Department shall create and then continue to manage 10-15% of the acreage base to meet “Older Forest” characteristics. The WADNR has deferred harvest of all stands 2 hectares (approximately 5 acres) in size or larger that have an establishment age prior to 1850 and meet WADNR’s Old Growth definition. By the end of the HCP, The Silviculture Policy (PSF) of WADNR has the target of attaining a level of 10-15% of each Western Washington Habitat Conservation Plan planning units for “older” forests-based on structural characteristics-over time. Currently the Planning Unit has approximately 3.4% of its area that meet the threshold for either “Old Growth” (0.6%) or “Older Forest” (2.8%). Some of the current ‘set aside areas’ (e.g. riparian areas) will develop to meet the criteria of older forests and some upland production sites will be silviculturally manipulated to create older forests.

WADNR has its own seed orchard that preserves the native genetic pool and is in the process of adding another cooperative seed orchard; Genetic reserve areas have been identified within the management unit. The goal is to encourage multiple species planting with locally derived stock of known provenance. Since 2000 approximately 88% of the planted stock has been Douglas-Fir with the remaining 12% comprised of Grand Fir, Noble Fir, Red Alder, White Pine, Western Red Cedar, and Hemlock. All seed source for the stock was from a known provenance and within acceptable limits for matching source to site.



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WADNR 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; most harvest units within the forests located in the Sherwood, Tahuya, and Green Mountain Forests are whole tree yarded with tops bucked and remaining branches removed at the landing. Due to historic continental glaciations the soils in many of these forests are not well developed. Removal of tree biomass (tops, branches, needles/leaves) during yarding is a concern and should be evaluated by DNR. The DNR does not currently have a soil scientist/expert on staff. The audit team recommends that more emphasis be made on evaluating the potential long term impact of current harvesting and silviculture practices on “shallow” soils within DNR ownership.

The WADNR has a program to inventory and identify old-growth forest based on structural condition. It also has a policy to protect all identified old-growth stands of five acres or larger in size. This program for identifying old-growth characteristics was developed with assistance from three of the leading experts on old-growth forest in the Pacific Northwest, Dr. Jerry Franklin, Dr. Thomas Spies and Dr. Robert Van Pelt. This procedure is preferable to identification of old-growth based on age alone because it is more comprehensive and accounts for the ecological conditions in unmanaged forest. As a measure of conservatism in implementation, the old-growth policy protects stands meeting the definition based on structural diversity, as well as those that originated prior to 1850. The WADNR policy and program for identifying and protecting old-growth forests is well founded in ecological science and appropriate for protecting the biological and social values of old-growth forests on DNR-managed forested state trust lands.

Snags, legacy trees, and large down woody debris (LDWD) are routinely left on all harvest areas. WADNR retains a minimum of 20 trees per hectare (8 trees per acre) and does not include the riparian 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 (60 per hectare or 25 per acre) as well as peninsular leave areas and riparian areas where all vegetation remained. Hardwood and shrub layers are controlled in harvest areas largely by not applying herbicides unless it is for invasive plant species control. There was an abundance of residual shrub and herb flora on all harvest sites inspected.

On a majority of harvest sites, the predominate native tree species (Douglas-fir) require openings for regeneration or vigorous young-stand development. The harvest systems used were found to be appropriate and effective for conifer regeneration. Plantings enhance diversity by controlling species composition and age distribution. WADNR Forest Practices Act has a “green up” size and designation for regeneration size and adjacent areas.



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Average and maximum regeneration harvest (clearcuts) unit size in the South Puget HCP Planning Unit both exceed the FSC standards of 40 acres (16 hectares) and 60 acres (24 hectares), respectively. The maximum regeneration harvest unit size in the Planning Unit is 100 acres (40 hectares), with the average being 44 acres (18 hectares). Auditors observed several regeneration harvest units over 60 acres in size. Regeneration harvest unit size was not seen to be a significant problem as the size and layout of WADNR harvest areas have been designed to implement the HCP. There are a number of biological and ecological reasons why regeneration cuts in excess of the standards requirements were found to be generally acceptable :

- Most reported harvest unit sizes are not reflective of the actual conditions on the ground. Two harvest units were observed that were reported to be close to 100 acres in size, but they were actually complexes of harvest area, riparian buffer and leave-tree patches. The contiguous open areas between buffers and leave-tree patches were individually less than 40 acres, and they contained relatively high densities of residual live trees and snags. Such sites are not comparable to contiguous harvest units of 60 to 100 acres from an ecological perspective.
- Small harvest units result in small patches of forest habitat and fragmented landscapes in subsequent decades. Several species of wildlife native to Western Washington are associated with interior forest conditions, and are negatively affected by fragmentation. Management for these species requires attention to habitat patch size, and may warrant regeneration harvest units in excess of 60 acres. In the South Puget HCP Planning Unit auditors observed recent harvests of up to 100 acres that will eventually develop into large patches of forest with habitat value for interior forest species.
- Small harvest units tend to require higher road densities, particularly in steep terrain. High road densities are a concern for both fish (due to increased potential for erosion and slope failure) and wildlife (where roads increase levels of human disturbance or introduce new predators). The WADNR has a comprehensive road management program that includes provisions for limiting road density.
- Small harvest units extend the time required to complete logging in a given drainage, thereby requiring that roads remain active for longer a longer time. As noted above, increased road use can negatively impact both fish and wildlife.
- Harvest unit layout is a complex process that is influenced by multiple environmental, social and economic constraints such as riparian buffers, steep and unstable slopes, current timber conditions, aesthetics and safe harvest methods. Occasionally, the harvest unit that best balances these conflicting concerns is larger than 60 acres. For example, splitting an 80-acre patch of forest into two 40-acre harvests simply to adhere to a numeric target may increase overall impacts by extending the active harvest period, increasing road



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density, and causing felled trees to be yarded over recent regeneration or through buffers.

Regardless of the above a non-conformance was issued against this verifier.

A Minor Non-Conformance was issued against indicator 6.3 f.4 indicating that that the WADNR should move toward smaller average regeneration harvest block size as per the Pacific Coast Regional FSC Standard.

All roads are generally surfaced and are subject to restricted use during extremely wet weather where damage can occur to the road sub-grade. No skid trails are constructed since shovel logging is predominately used on tractor logging units. Roads were found to be well maintained. Roads are designed and located in conjunction with sale preparation activities. Road spacing and design is based on logging systems to be used and the overall transportation plan for the area. The Road Engineer is involved in the layout and /or review of the harvest and road plan. Landings are located on ridge points and along roads away from water courses and seeps. Landings are normally sloped so that water can drain. Debris piles generally aren't burned. Surfaced roads are water-barred and generally barricaded. Most roads are gated and access is restricted all or part of the year. Designated roads are open to the public for recreation and hunting.

No site damage was observed on harvest areas. Slash was re-distributed over sites which helps maintain productivity and minimize site disturbance. Slash is generally well distributed throughout the harvested areas and slash on landings is piled.

High risk areas for landslides and mass wasting have been mapped and no harvesting or road building is occurring in these areas. All planned activities in landslide prone areas are evaluated by staff geologists and engineers and a risk assessment and analysis is completed. No activities are allowed in high risk areas. On slopes under 40%, a shovel logging system is generally used. Slopes greater than 40% are cable logged. Some helicopter logging has been conducted in inaccessible areas and areas where road building was cost prohibitive or soil stability issues were present.

The Washington Forest Practices Act regulations with regards to water quality and water bodies exceed those of the FSC regional standard. The WADNR exceeds the Forest Practices Act requirements in all 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 have scheduled their removal or replacement. All work is to be completed by 2015. The auditors observed five locations where fish barrier culverts had been replaced.

WADNR does not regularly conduct aerial herbicide/pesticide applications on the South Puget HCP Planning Unit. Some ground and



hand application is conducted on a very small percentage of the ownership. WADNR has an approved list of herbicide use, which includes herbicides with shortest half-life and those that can be used at the lowest concentrations. From a review of the five year summary of herbicide use Triclopyr (ester formulation) was the major product used and this product is not on the list of FSC banned chemicals. An integrated pest management approach was evident, with chemical pesticides used only after no treatment and non-chemical treatment options are considered.

6.1.7 - Principle 7 – Management plan

The South Puget HCP Planning Unit is the first Planning Unit to develop a Forest Land Plan. The current plan is in draft form and awaits SEPA review and then final approval. The plan that was reviewed by the audit team was a partial draft that met the majority of requirements specified in the standard. The plan sets out the objectives for the forest, provides a detailed description of the forest resources covered by the plan, describes the silvicultural practices being employed, and provides a series of maps to document the plan.

The Forest Land Planning Policy describes WADNR's application of State and federal laws and Board of Natural Resources policy to a specific geographic area. Forest land planning not only identifies forest management strategies and where and what activities will most likely produce the desired outcomes, but also supports adaptive management as plans are revised in response to a major forest change (e.g. large fires, major pest infestation).

A minor non-conformance (WADNR-NC1) was issued against the plan for not having been approved through the SEPA process. A second minor non-conformance (WADNR-NC2) was issued as a publicly available plan summary was not available.



6.1.8 - Principle 8 – Monitoring and assessment

The WADNR has an extensive monitoring program which addresses all aspects of this principle. Monitoring of the HCP (Habitat Conservation Plan) is carried out by both the WADNR and the US Fish and Wildlife Service. Public reports on monitoring activities for the HCP are published annually detailing the results of management activities on the achievement of HCP goals.

The WADNR has a robust forest inventory system. The current re-inventory cycle is ten years. However, approximately, every two years the inventory is updated for accruals and depletions and grown using the Forest Vegetation simulator. Inventory plot measurements include standing dead, down woody debris, plant associations, forest cover plot (moss, shrubs, forbes), 20 habitat association species are assessed; monitoring of characteristics of water quality such as temperature, sedimentation, and chemical loads is deferred to the monitoring programs within HCP and WA State Forest Practices monitoring.

Forest regeneration is assessed at 1, 3 and 5 years after harvest; growth rates are monitored by taking increment cores on inventory plots and recording the most recent 5 and 10 yr. growth rates.

Monitoring of environmental impacts are thoroughly reviewed for numerous other indicators in this standard and are adequately addressed. Forest operations inspections undertaken prior during, and after activities occur are collected diligently by WADNR staff. These inspections focus on environmental performance and contractual compliance. In relations to roads and water crossings, monitoring is carried out according to the schedule set in the Road Maintenance and Abandonment Plan. The results of all monitoring activities are made publicly available through a variety of reports such as: Habitat Conservation Plan for state trust lands, 2006 Annual Report, Contract Harvesting Program Report to the Legislature, and Forest Roads Accomplishment Summary for Calendar Year 2005.

WADNR has a detailed timber sales process which allocates most timber to the highest bidder. Anyone who harvests timber on the South Puget HCP Planning Unit must enter into a detailed contract that specifies operating conditions and practices. The current process is compatible with FSC Chain-of-Custody requirements. The WADNR can easily add the necessary information to contracts and invoices to meet the requirements of STD-FSC-40-004.

One non-conformance was identified against this principle (WADNR-NC3) which was related to the lack of systematic and regular social impact assessment.

6.1.9 - Principle 9 – Maintenance of high conservation value forests



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There are a large number of high conservation value forest attributes found on the South Puget HCP Planning Unit. The Planning Unit is located on the Westside of the Cascade Range on the North American west coast which has been the focus of controversy for the past twenty years regarding habitat protection and ecosystem preservation. In this atmosphere, the WADNR has developed a variety of programs to conserve ecological values. In the mid-1990's WADNR initiated a comprehensive habitat conservation plan to protect the habitat of threatened and endangered species. This process came out of the federally mandated Endangered Species Act. It resulted in the development of a comprehensive plan to protect the habitat of threatened and endangered species such as the northern spotted owl and marbled murrelet.

The WADNR is implementing a Habitat Conservation Plan to protect 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 HCP covers a host of species including northern spotted owl, marbled murrelet, salmonids, and other federally listed species. The HCP provides specific direction on the management of timberlands and affects more than 75% of state forestlands and treats a portion of them as High Conservation Value Forests.

The Wildlife Habitat Policy discusses DNR's Habitat Conservation Plan (HCP), which is a multi-species HCP that protects listed species as well as unlisted species and uncommon habitats. The three main strategies of the HCP provide habitat for their respective species and ecosystems and either directly or indirectly protect HCVF. The Riparian Strategy protects riparian and wetland areas which are considered HCVF and may also contain G1 & G2 species. The Northern Spotted Owl Strategy provides habitat for a significant contribution to demographic support, maintenance of species distribution and facilitation of dispersal. Included within these spotted owl habitats are areas of old growth and older forest conditions as well as protection of large snags and down wood. The marbled murrelet Strategy also targets unique habitat types with an older forest stand condition objective. In addition to the three main strategies, the HCP also protects Uncommon Habitats. By their very name, these habitats are unique and uncommon and because of their rarity, they provide habitat for and contain rare species. These uncommon habitats include: balds, cliffs, caves, talus slopes, oak woodlands, mineral springs, snags and structurally unique trees. Through these HCP protection measures, there are numerous federally listed plant species that will be protected.

The Special Ecological Features Policy defines how such features are identified and protected through the Natural Areas Program. Special ecological features are those species, specialized habitats, ecosystems and other natural features that are in need of special management consideration for their long-term survival. These include rare species and rare ecosystem types, as well as widespread



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ecosystem types that are threatened in some manner. Special ecological features may be priorities for inclusion within the statewide system of natural areas, including Natural Area Preserves and Natural Resources Conservation Areas.

The Cultural Resources Policy discusses how “cultural resources” are identified and protected. Cultural resources include traditional places, historic sites and archaeological resources. Cultural resources may occur independently or within existing HCVF and thus require assessment and potential protection measures. As an example, culturally modified trees are a cultural resource and may be considered an HCVF because of their importance to a traditional cultural identity.

The General Silvicultural Strategy Policy discusses DNR’s intent to actively manage suitable structurally complex forests to achieve older-forest structures across 10-15 percent of each Western Washington HCP Planning Unit in 70-100 years. Older-forest structures that contribute to this target are represented by stands in the fully functional or niche diversification stage of stand development. These older forest conditions will likely include HCVF.

All WADNR activities are screened for the presence of G1 or G2 species or ecosystems. WADNR’s Planning and Tracking system has several features that allow land managers to view spatial or tabular data of known HCVF occurrences. This system accesses the Natural Heritage Program, WA Department of Fish & Wildlife and Forest Practices Sensitive Sites databases. In addition to WADNR’s Planning and Tracking system, land managers and field staff can access these spatial databases through the State Uplands Viewing Tool and the Forest Practices Risk Assessment Viewing Tool.

In discussion with the US Fish and Wildlife Service, it was confirmed that WADNR was in compliance with all HCP monitoring and compliance requirements. Effectiveness monitoring is being conducted in all planning units. Validation monitoring efforts are only being implemented in the Olympic Region at this time. It was reported that the WADNR does a fine job of compliance monitoring and that the WADNR has good communication with the Service. USFWS staff also indicated that the WADNR especially in the South Puget Sound Region is a leader and innovator leading the charge on HCP monitoring. Examples include the communications with the Cougarilla Timber Sale, the snow breakage concern with marbled murrelet habitat, and the variable density thinning for northern spotted owl habitat as positive examples of how well the system is working.

The HCP and Natural Areas Program have gone through extensive public consultation beyond the requirements of SEPA. Consultations have utilized an array of techniques including public comment solicitation, public meetings, and direct negotiation with interests. Prior to the audit comments on HCFVs were received from 10 people as part of an e-mail survey of 600 stakeholders and citizens. The majority of the comments were very positive in ratings WADNR’s work in this area.



During the audit 14 representatives of a variety of stakeholder groups were interviewed. HCVFs were discussed and the general observation was satisfaction with WADNRs approach and implementation.

No non-conformances were identified against this principle.

6.1.10 - Principle 10 - Plantations

Based upon the seven conditions/criteria of a "Plantation" in principle 10 of the Pacific Coast US standard it was determined that the Washington State DNR does not practice plantation management and therefore Principle 10 does not apply.

6.2 - Systematic presentation of results

** See combined auditors checklist in Appendix C of the report.

6.3 - Identification, traceability and monitoring of products

WADNR has a rigorous process in place for tracking and tracing its timber. Whether timber is sold in a stumpage auction, log auction or a tendered sale the state tracks the amount, type and species of the timber explicitly.

6.3.1 - Description of the implemented systems to ensure the traceability

WADNR's product sales procedure and timber sales administration procedure designate how the sale of state forest products are undertaken. Once a timber sale is set-up and sold the designated products are harvested by the successful proponent. Auction sales are intensively tracked as timber is sold on a volume basis. The state tracks all timber very closely to ensure that full value is derived from the timber sale. For the log sales program, individual log sorts are sold at auction to purchasers. The sorts are harvested by WADNR contracted loggers and scaled prior to delivery to the purchaser, ensuring adequate control and monitoring.



6.3.2 - Description of the final location of taking in charge

Title to the forest products conveyed passes at confirmation of the sale. Purchaser bears the risk of loss of or damage to and has an insurable interest in the forest products from the time of confirmation of the sale of forest products. In the event of loss of or damage to the forest products after passage of title, whether the cause is foreseeable or unforeseeable, the forest products shall be paid for by Purchaser.

6.3.3 - Description of the documentation or of the marking system

WADNR has a detailed documentation system for all of its timber sales that includes sale contracts which clearly define the origin and ownership of the timber. Additionally, where log auctions are conducted, individual loads are tracked to the final destination.

6.3.4 - Evaluation of the mixing risk

There is no risk of product mixing as individual timber sales are independently removed regardless of whether the success bidder has multiple timber sales..

6.4 - Elements subjects to controversy

A letter was received from another Certification Body on April 5th of 2007. Concerns were expressed that *"FSC-certification of the Washington state forestlands was and remains highly controversial and an initiative that is being very closely monitored by numerous environmental organizations"*. During the audit all the major ENGOs in the area were contacted and direct discussions were held with four of them. None expressed a controversial issue, though some are sceptical of the WADNR. In the past there had been difficult relations between the WADNR and some environmental groups, mostly centred on the HCP and the protection of the northern spotted owl habitat. In response to a lawsuit on habitat management and timber harvesting the WADNR led negotiations on a settlement. On April 7, 2006 the WADNR entered into an agreement with the major local ENGOs and forest industry, termed the "Settlement Agreement". This milestone agreement covers a range of topics including; northern spotted owl conservation measures, the Olympic Experimental State Forest, owl areas, spotted owl habitat delineation, innovative silviculture, old growth forests, leave trees, and down woody debris. The audit team met with or talked to all of the major partners to this agreement, all were favourable to the certification of the WADNR's South Puget HCP Planning Unit.



7 - Scope retained for the certification

The scope of this certification includes round wood timber from state trust lands within the South Puget HCP Planning Unit and includes the following tree species:

- Douglas-Fir
- Western Red Cedar
- Western White Pine
- Western Hemlock
- Red Alder
- Noble Fir
- Grand Fir
- Spruce
- Silver Fir

Additionally, the following Non-timber Forest products are included:

- Boughs for wreaths
- Salal and other floral greens

7.1 - Geographical limitation at the level of the entity

The geographic scope of the certification is DNR-managed forested state trust lands within the South Puget HCP Planning Unit.

7.2 - Limitation at the level of the forest products

None.

8 - Proposals regarding the certification decision

8.1 - Explication on all rating, weighting systems or other systems used decisions taking

The audit team did not use any rating or weighting system to conduct the audit. Actually, the whole referential's requirements are considered equivalent and each criterion must be satisfied by the applicant entity. The non-conformity against each indicator is evaluated.

8.2 - Clear description of all recommendations and conditions associated to the certification decision

No recommendations are being put forth..



8.3 - Minor Corrective Action Requests

Six minor corrective action requests were raised. Two requests relate to Principle 7 and the draft management plan which needs to undergo SEPA approvals which are expected to happen by the end of 2007. One request was made against Principle 4, a need for systematic social impact assessment. One request was made against Principle 5 related to maximizing stocking and growth in regenerating forests. Two corrective action requests were made against Principle 6, the first being in regards to reducing regeneration harvest sizes to conform with the Pacific Coast standard and the second being revisions to the SEPA Guidance Handbook terminology to be more in line with the Pacific Coast Standard.

N°	Minor corrective action requested	Proposed date of implementation	Requirement number
01	Complete the currently draft Forest Land Plan for South Puget HCP Planning Unit and ensure that all elements are available	Within 1 year	Principle 7
02	Prepare a plan summary for the management plan	June 29 2008	7.4
03	The DNR should implement a systematic process for social impact assessment.	June 29 2008	4.1, 8.2
04	More attention is to be given to maximization of potential stocking and growth within regeneration cuts	June 29 2008	5.1 a & 5.6 c
05	Move towards smaller average regeneration harvest block size as per the Pacific Coast Regional FSC Standard.	June 29 2008	6.3 f 4
06	The WADNR SEPA Guidance Handbook needs to be more inclusive in order to align with the Glossary for the Pacific Coast Region definitions of "rare species" and "rare plant communities".	June 29 2008	6.2 a & 6.2 b

8.4 - Major Corrective Action Requests

None issued

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

The Washington Department of Natural Resources forest and land management system, if implemented as described, will ensure that all of the requirements of the FSC Pacific Coast US standard are met throughout the South Puget HCP Planning Unit, subject to correction of the identified non-compliances.

9 - Appendices



- A. CV of the members of the audit team (private)
- B. Peer review of initial audit (see end of the document)
- C. Checklist(s) (private)
- D. Complete list of the consulted stakeholders prior to the initial audit (private) and answer to stakeholders' comments
- E. List of documents remitted by the applicant (private)
- F. Copy of the non-conformity form(s) (private)
- G. Definitive certification decision (private)

Issued September 21, 2007; finalized November 27, 2007; reviewed January 23, 2008; and updated July 19, 2010.

FSC Product Manager,

Nicolas Barrière

Lead Auditor,

Brian Callaghan

10 - Certification decision

The BV Certification Committee has assessed the documents submitted for analysis agreed to grant a FSC FM certificate to the Washington DNR:

Deliberation: Following the examination of the initial audit report reference AR080120 and the complementary documents brought in March, the Certification Committee decides to grant an FSC FM certificate to the Washington Department of Natural Resources.

This certificate is issued under the condition to comply with the 6 CARs in due time as specified in the audit report.



SURVEILLANCE AUDIT REPORT

Surveillance audit date: December 1-2, 2008

B. Surveillance Audit 1

This surveillance audit was a special surveillance which was necessary due to the long time period (11 months) between the initial audit and the granting of certification. The purpose was to check on the Corrective Action Requests issued during the initial audit. This audit was witnessed by an auditor from Accreditation Services International and the FM Certification Manager from Bureau Veritas Certification France.

11 - Base of evaluation

11.1 - Date of the surveillance evaluation

December 1 and 2 2008

11.2 - Composition of the audit team

Lead auditor: Brian Callaghan RPF, CEA(SFM), FSC FM qualified auditor on behalf of Bureau Veritas Certification. Mr Callaghan has fifteen years auditing experience undertaking both compliance and certification audit. Mr. Callaghan has extensive experience in forest planning, wood supply modelling, and forest valuation.

Observers : Paolo Tranquillini, Accreditation Services International auditor, accreditation manager, Bonn, Germany.

Héloïse d'Huart, FM Certification Manager, Bureau Veritas Certification, France

12 - Information collecting modalities

12.1 - Description of the audit program

The audit on site was carried out over two days and in two separate phases. On the first day progress was reviewed on the six minor Corrective Action Requests issued during the initial audit. Additional issues relating to the operation of their certificate and the chain of custody were discussed. On the second day of the audit five field sites were visited which highlighted the States approach to Variable Retention Harvesting. The audit schedule is provided below.



Bureau Veritas Certification
92046 Paris La Défense Cedex
www.bureauveritas.com/certification

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Last audit: October, 4-7, 2011
L.A.: Brian Callaghan/Vincent Corrao
Ref: PR080501US
Version: 5.1

AUDIT SCHEDULE

Person	Time	Place	Activity
- December 1, 2008			
B. Callaghan	8:30 am	WADNR Office Olympia WA	Opening Meeting and update of events with Lislie Sayers, Allen Estep, Tami Miketa, Gretchen Nicholas, Heloise d'Huart (BV France), Paolo Tranquillini (ASI)
B. Callaghan	10:00 am	WADNR Office Olympia WA	Review progress made to date on CARs 1, 2, 6,
B. Callaghan	1:00 pm	WADNR Office Olympia WA	Invoicing FSC Timber Sales
B. Callaghan	1:30 pm	WADNR Office Olympia WA	Logo Use and Approvals
B. Callaghan	2:00 pm	WADNR Office Olympia WA	Review progress made to date on CAR5
B. Callaghan	3:00 pm	WADNR Office Olympia WA	Review progress made to date on CAR3
B. Callaghan	4:00 pm	WADNR Office Olympia WA	Review progress made to date on CAR4
B. Callaghan	5:00 pm	WADNR Office Olympia WA	Daily Wrap-up
December 2, 2008			
B. Callaghan	8:00 am	WADNR Office Olympia WA	Depart Olympia for field sites
B. Callaghan	10:00 am	Sahara Creek	Campground and trailhead
B. Callaghan	10:45 am	Fortune Timber Sale	Variable retention harvest, good renewal
B. Callaghan	11 :30 am	4X4 south	Variable retention harvest, good renewal
B. Callaghan	12:00 pm	Big Beaver	Variable density thinning
B. Callaghan	12 :30 pm	Eager Beaver Timber Sale	Variable retention harvest, good renewal
B. Callaghan	4:30 pm	WADNR Office Olympia WA	Closing meeting with Lislie Sayers, Tami Miketa



12.2 - Documents review

- Natural Disturbance and Stand Development Principles for Ecological Forestry, JF Franklin, RJ Mitchell, BJ Palik, 2007
- Old Growth Timber Harvest Deferral and Protection (Westside), WADNR, Forestry Handbook Procedure PR 14-004-045, 2007
- Habitat Conservation Plan for State Trust Lands 2008 Annual Report, WADNR
- An Examination of the WADNR Timber Sale Program Against a Backdrop of Changing Regional Infrastructure and a Growing Forest Health Crisis, CL Mason, Rural Technology Initiative, Univ. of Washington, 2005
- South Puget HCP Planning Unit Forest Land Plan Draft Environmental Impact Statement, WADNR, 2008
- Washington's "Green Certified" State Trust Forests, WADNR, 2008
- Developing Westside Silvicultural Prescriptions, WADNR, 2007
- Washington Tree Seed Transfer Zones, WADNR, 2002
- Forest Management Planning & Tracking, Users Manual, WADNR, 2008
- Email notification to DNR users of Planning & Tracking Proposed Update of harvest types, WADNR, 11.24.08
- Email notification to DNR users of Planning & Tracking Completed Update of harvest types, WADNR, 11.24.08
- Policy for Sustainable Forest (PSF)-Aligned Timber Harvest codes for Planning & Tracking Implementation Briefing, WADNR
- Standard Forestry Terms and Tree Names, A training and reference pamphlet for DNR management of Forest Trust Lands, Definition of Variable Retention Harvest, WADNR, 7.10.08
- Letter to Bureau Veritas (VRH references, VRH examples), WADNR, 3.19.08
- The Retention System: Maintaining Forest Ecosystem Diversity, British Columbia Forest Practices, 2002
- Email to Bureau Veritas (overstory, rotation age, non-governmental agencies), WADNR, 5.2.08
- Management of Forest Stand Cohorts (Westside), Forestry Handbook Procedure PR 14-006-090, WADNR, July 2008
- Comments to the proposed FSC Standard, VRH discussion, WADNR, August 2008
- FSC promotional logo usage approval spreadsheet with originals, WADNR, November 2008
- Timber Notice of Sale and Timber Sales Map, agreement 30-082229, WADNR, auction date 12.18.08
- State of WA DNR Bill of Sale and Contract for Forest Products, agreement 30-082229, WADNR, October 20083
- Board of Natural Resources Timber Sales Auction Results, WADNR, November 2008



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- Email to WADNR purchasers, FSC Certification Clause Language, WADNR, September 2008
- Timber Sales Status Report, The Pickle VDT and Regeneration, WADNR, 11.18.08
- State of Washington, Department of Natural Resources, Completed Load Ticket 502226, WADNR, 11.7.08
- Interagency Agreement between the State of Washington, Department of Natural Resources, Department of Corrections, and Department of Social and Health Services for the Use of Adult inmates and Juvenile Offenders Under Custody of the State of Washington, January 2005
- Revised Code of Washington (RCW) 79.10, Multiple Use Act, September 2006
- South Puget Sound Region Recreation Trails Map (Rock Pit), Section 20, Township 15 North, Range 06 East, WADNR, 12.10.08
- A Summary of the Current Forest Management Strategies for the South Puget HCP Planning Unit, WADNR, November 2008
- South Puget HCP Planning Unit Milestones Update, WADNR, November 2008
- Department of Natural Resources Social Impact Assessment, November 2008
- Evaluation of Blanchard Mountain Social, Ecological & Financial Values, 2002
- Final Environmental Impact Statement on Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington and for Determining the Sustainable Harvest Level, July 2004, pgs. 2-11 to 2-12.
- Assessing Socioeconomic Resiliency in Washington Counties, Jean M. Daniels, 2004.
- Local Economic Vitality, Policy PO14-017, WADNR, 2006
- Final Environmental Impact Statement on the Policy for Sustainable Forests, June 2006, pgs. 3-160 to 3-163.
- The Future of Washington Forests, WADNR, University of Washington, April 2007.
- General Silvicultural Strategy, Policy PO14-019, WADNR, 2006
- FMU Rotational Objectives, Forestry Handbook Procedure PR 14-005-010, WADNR, April 2008
- Silvicultural Rotational Prescriptions, Forestry Handbook Procedure PR14-005-060, WADNR, April 2008
- Reforestation, Forestry Handbook Procedure PR 14-006-010, WADNR, April 2008
- Surveying Young Stands, Forestry Handbook Guideline GL 14-006-010, WADNR, May 2000
- Competing Vegetation Survey for Conifer Stands, Forestry Handbook Task TK 14-006-010, WADNR, August 1999
- South Puget Planning Unit Planting Surveys, FY 2007, WADNR
- Financial Analysis Worksheet for Silvicultural Pamphlet, WADNR
- Completed activities report, Betty Beaver U3, WADNR, November 2008
- 5-year field performance of WS Douglas Fir Stock Types w/ graphs, WADNR,



- DNR Regeneration Trials – Debell, WADNR, December 2008
- Average Regeneration Harvest Block Size Bar Chart per Fiscal Year, South Puget HCP Planning Unit, WADNR
- Average Regeneration Harvest Block Size Tabular Data per Forest Management Unit per Fiscal Year 2009-2010, South Puget HCP Planning Unit, WADNR
- Forest Management Unit Maps, WADNR South Puget HCP Planning Unit, WADNR
- WA Natural Heritage Program Reference Desk GIS data and ranking system, 2008
- Timber Sales SEPA Checklist Guidance, Evaluation of State Forest Land Activities. Final Section Three – WADNR (Revised 9/23/08)

12.3 - On-site visit(s)

During the audit one day was spent in the offices of the Washington Department of Natural Resources reviewing documents and interviewing staff. On the second day five field sites were visited. Sites were chosen to focus on the issues relating to variable retention harvesting and how it relates to clear cutting. All harvest areas were inspected to determine their condition; whether there had been any significant soil disturbance, were boundaries respected, was the site regenerating, was there damage to residual trees. All areas examined met the Habitat Conservation Plan, Policy for Sustainable Forests and Forest Practices Standards of the State. On planted sites seedlings were found to be vigorously growing.

The recreation area a Sahara Creek was neat and orderly and inactive at the time. An improvised shooting range was observed where citizens can fire their weapons in an unsupervised fashion. Ted Keeley observed that this site will be shut down.

12.4 - Interview(s) of involved people met

Manager(s):

- Ms. Gretchen Nicholas - Land Management Division Manager
- Ms. Tami Miketa, Land Management Division Assistant Manager (Ecosystem Services)
- Mr. Angus Brodie, Land Management Division Assistant Manager (Data Stewardship)
- Mr. Pete Holmberg, Land Management Division Assistant Manager (Silviculture & Regeneration)
- Craig Partridge, Policy Director

Employee(s):

- Ms. Lislie Sayers – Forest Certification Coordinator
- Mr. Allen Estep, PSF / Certification Program Lead (Stewardship)
- Mr. Bob Aulds, Silviculture Section Lead
- Mr. Jeff DeGraan, Reforestation Specialist
- Mr. Mark Thibo, State Lands Assistant



- Mr. Ted Keeley, Unit Forester
- Ms. Farra Vargas, Program Implementation Lead
- Ms. Joanne Wearley, Environmental Planner
- Mr. Dave Gorden, Program Administrator

12.5 - Stakeholders identification and consultation

No stakeholders were consulted during this surveillance audit.

12.6 - Other evaluation techniques

None employed

12.7 - Total man days for the audit

The audit included two audit days and two days reviewing documents and preparing reports. In total four man-days were expended.

12.8 - Changes since last audit

There have been no changes in the management team in place. The Commissioner of Public Lands changed during the November elections in 2008 and there has been no indication that significant changes are imminent.

12.9 - Surveillance audit closing meeting

A closing meeting was held which has re-affirmed the clearance of the six outstanding Corrective Action Requests. One minor CAR was issued during the audit which related to the documentation provided to purchasers of FSC certified timber.

13 - Referential

13.1 - Forest management referential used for the initial audit

No changes have occurred to the Pacific Coast US standard since the initial audit.



14 - Audit team observations

The Washington Department of Natural Resources put forth a substantial amount of evidence for each of the six CARs issued during the initial audit. For each corrective action sufficient evidence was produced to clear the requirement. The Department is complimented on the quality and extent of evidence provided to the auditor.

CAR #	CAR description	P&C indicator number	Action taken by the entity to close the CAR	Closed/ Open	Date of closure
01	Complete the currently draft Forest Land Plan for South Puget HCP Planning Unit and ensure that all elements are available	Principle 7	Provided July 2008 final version of the forest land plan. All elements have been incorporated,	Closed	December 2 2008
02	Prepare a plan summary for the management plan	7.4	Plan summary report (<i>A Summary of the Current Forest Management Strategies for the South Puget Sound HCP Planning Units</i>) prepares and available on WDNR website www.dnr.wa.gov.	Closed	December 2 2008
03	The WADNR should implement a systematic process for social impact assessment.	4.1, 8.2	WADNR put forth seven studies related to social impact assessment. Investigating ways to bring impact assessment into forest land plans.,	Closed	December 2 2008
04	More attention is to be given to maximization of potential stocking and growth within regeneration cuts	5.1 a & 5.6 c	Re-examined the three sites in question. Review prescription practices and stock production techniques.	Closed	December 2 2008
05	Move towards smaller average regeneration harvest block size as per the Pacific Coast Regional FSC Standard.	6.3 f 4	WADNR adopting Variable Retention Harvesting to replace classic clear cuts. Cut size average is 38 ac over past 10 years.	Closed	December 2 2008



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CAR #	CAR description	P&C indicator number	Action taken by the entity to close the CAR	Closed/ Open	Date of closure
06	The WADNR SEPA Guidance Handbook needs to be more inclusive in order to align with the Glossary for the Pacific Coast Region definitions of "rare species" and "rare plant communities".	6.2 a & 6.2 b	Guidance Handbook has been updated and specific definitions added.	Closed	December 2 2008

CAR 1: the Washington DNR provided a completed copy of the *South Puget HCP Planning Unit Forest Land Plan*, WDNR, 2008 including a DVD of appendices. Upon review, the document was found that the plan met the requirements of Principle 7.

CAR 2 was to prepare and make publicly available a plan summary for the South Puget HCP. The Washington DNR prepared and presented a summary entitled *A Summary of the Current Forest Management Strategies for the South Puget Sound HCP Planning Units*. This report was provided to the auditor prior to the audit and upon review it was found to be acceptable. The report is publicly available on the Washington DNR website (http://www.dnr.wa.gov/Publications/lm_fsc_cert_summary_final.pdf) or can be obtained directly from the Washington DNR.

CAR 3: Seven studies were put forth to address Corrective Action 3. Reviewing these reports it was evident that Washington DNR is actively undertaking socio-economic assessments. The corrective action was cleared with the proviso that the Washington DNR continue to develop its social-economic impact assessments and apply it to Forest Land Planning.

CAR 4: During the initial audit three sites (of 24) were inspected which exhibited very poor growth and with numerous sclerotinous trees. Corrective Action 4 called for re-examination of those three sites and development of silvicultural prescriptions which would optimize forest growth. Silviculturalists for the State examined the three sites and acknowledged that they had problems which were related to the planting sites and climatic conditions at the time of planting causing the problem. The State also provided a detail review of the various seedling stocks used by WDNR and the need to correctly match seedlings to their site. A number of documents were brought forwards as evidence, including;

- Developing Westside Silvicultural Prescriptions, WDNR, 2007
- Washington Tree Seed Transfer Zones, WDNR, 2002
- Forest Management Planning & Tracking, Users Manual, WDNR, 2008

The WDNR has adopted Variable Retention Harvesting which moves WDNR away from traditional clear cutting. The evidence provided for Corrective Action 5 included site visits to three harvest areas which had been harvested with Variable Retention Harvesting. Additionally a large amount of documentation was provided on the application of this technique on forests in the Northwest US. Documents included:



- Natural Disturbance and Stand Development Principles for Ecological Forestry, Franklin JF, RJ Mitchell, BJ Palik, 2007
- Old Growth Timber Harvest Deferral and Protection (Westside), WDNR, PR 14-004-045, 2007
- Habitat Conservation for State Trust Lands 2008 Annual Report, WDNR

CAR 6 the Washington DNR provided a revised copy of *The WDNR SEPA Guidance Handbook* that included definitions of “rare species” and “rare plant communities” which are in agreement with the FSC Pacific Coast standard.

15 - Proposals regarding the certification decision

15.1 - Description of new recommendations

A - . Continue to develop its social-economic impact assessments and apply it to Forest Land Planning as explained in the CAR 3 closing comments.

15.2 - New Minor Corrective Action Requests

One minor corrective action request was made during the audit. Sales invoices for FSC timber sales do not currently contain the required chain-of-custody information. Sales invoices for FSC certified timber must include the product group and the WDNR FSC certificate number.

N°	Minor corrective action requested	Proposed date of implementation	Requirement number
07	Ensure that invoices for FSC timber include the product group (FSC Pure) and the certificate number	December 3, 2009	FSC-STD-40-004v2/ 6.1.1, 4.1.1

Upon inspection of timber sales receipts it was noted that neither the product type or the certification number were present – as is required by the FSC Chain-of-Custody standard.

15.3 - New Major Corrective Action Requests

No major corrective action requests were issued.

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

It is the opinion of the auditor that the Washington Department of Natural Resources continues to meet the requirements of the FSC forest management standard for the Pacific Coast of the USA. All six of the outstanding minor corrective action requests have been addressed and closed. The certification of the Washington State Department of Natural Resources South Puget HCP Planning Unit should continue.

16 - Certification decision



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L.A.: Brian Callaghan/Vincent Corrao
Ref: PR080501US
Version: 5.1

The FSC FM certificate of the Washington State Department of Natural Resources South Puget Sound HCP remains valid.

Issued January 27, 2009; finalized March 27, 2009; and updated July 19, 2010.

FSC Product Manager,

Héloïse D'HUART

Lead Auditor,

Brian CALLAGHAN



C. Surveillance Audit 2

A second FSC forest management surveillance audit of the Washington Department of Natural Resources' South Puget HCP Planning Unit was undertaken from November 16 to 19, 2009. The purpose of the audit was to check on the Corrective Action Requests issued during the previous audits, monitor compliance with FSC Pacific Coast (USA) standard, consult with stakeholders and proceed to the extension of the scope of the certificate. Indeed in September 2009 the Washington Department of Natural Resources acquired 8,361 ha (20,660 ac) of forestlands within the South Puget HCP Planning Unit and wants to include these in the actual scope of the certificate.

17 - Base of evaluation

17.1 - Date of the surveillance evaluation

November 16th to 19th 2009

17.2 - Composition of the audit team

- Lead auditor:**
- Brian Callaghan RPF, CEA(SFM), FSC FM qualified Lead auditor on behalf of Bureau Veritas Certification. Mr. Callaghan has expertise in forest policy, forest planning and forest assessment. He has been auditing forest management under a variety of standards for the past ten years.
- Auditor:**
- FSC FM qualified auditor on behalf of Bureau Veritas Certification. The auditor is the President of a full service forest consultancy in the US Northwest, has expertise in all aspects of forest operations and considerable experience working with Tribes in the region.

18 - Information collecting modalities

18.1 - Description of the audit program

The audit was carried out over four days. November 16th was spent interviewing stakeholders with the focus on those organizations who had yet to provide input into the audit process. On November 17 the auditors undertook a document review for Principles 4, 6, 7, and 8. The one CAR issued during the 2008 surveillance was checked. Progress was monitored on the recommendation made in 2008, which was an extension to Corrective Action Request (CAR) 3 issued during the initial audit. Additional issues relating to the operation of their certificate and the chain of custody were discussed. November 18 and 19 were spent in the field examining operations. The audit schedule is provided below.



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AUDIT SCHEDULE			
Person	Time	Place	Activity
November 16, 2009			
Callaghan	9:00 am	Olympia, WA	Stakeholder interviews
Callaghan Auditor	7:00 pm	Olympia, WA	Audit Team meeting
November 17, 2009			
Callaghan Auditor	8:30 am	WADNR Office Olympia WA	Opening Meeting with Lislle Sayers, Allen Estep, Tami Miketa
Callaghan Auditor	10:00 am	WADNR Office Olympia WA	Review progress made to date on outstanding CARs, review use of FSC logo, review chain-of-custody process
Callaghan Auditor	1:00 pm	WADNR Office Olympia WA	Document Review P 4, 6, 7, 8
Callaghan Auditor	4:30 pm	WADNR Office Olympia WA	Daily Debrief & Depart
November 18, 2009			
Callaghan Auditor	7:00 am	WADNR Office Olympia WA	Depart Olympia for field sites
Callaghan	9:00 am	Yuhu, BBWest U4	2008 VRH, Public Use, HCP Variation, Harvest, plant
Auditor	9:00 am	Bear Creek VDT U1, Bears Ridge PCT, West Dragon VDT	2009 VDT, Hand Plant, Pre-Commercial Thinning, HCP deviation, habitat enhancement
Callaghan	11:00 am	Simon Sorts, Twice Forgotten	Variable retention harvest, fish passage, Road maintenance and abandonment (RMAP)
Auditor	1:00 pm	Charley Creek (NAP), Yeti Hardwood 3	Natural Area Preserve, RMAP (Road Maintenance and Abandonment Plan), Vegetation Management
Callaghan	1:00pm	, Howeling Hurd U1, Square Plot U1, Good Seed U5, GM1, Barbed Shroom Pole U1, Green Mtn Horse Camp	2008 VRH, Closeout Specs, Hand Planting, Low Impact Harvesting, RMAP (Road Maintenance and Abandonment Plan). Revisited Square Plot to check on condition of planted stock (issue during initial audit).
Callaghan Auditor	5:30 pm	WADNR Office Olympia WA	Daily Debrief and depart
November 19, 2009			
Callaghan Auditor	7:30 am	WADNR Office Olympia WA	Depart Olympia for field sites



AUDIT SCHEDULE			
Person	Time	Place	Activity
Callaghan Auditor	8:00 am	Vanilla Bean, Weald U1&U4, Copper Ridge 2aged	Plant & Herbicide, 2-aged Management, Regeneration Cooperative Research
Callaghan Auditor	12:00 pm	Perry Creek U1, Sleeper U1	PCT, plant 93, thin 08, herbicides
Callaghan	4:30 pm	WADNR Office Olympia WA	Closing meeting with Lislie Sayers, Allen Estep, Jed Herman, Tami Miketa

18.2 - Documents review

- South Puget HCP Planning Unit Forest Land Plan, WADNR, 2008
- Forest Management Planning & Tracking, Users Manual, WADNR, 2008
- Jobs, Revenues, and Taxes from Timber Harvest; An examination of forest industry contribution to the Washington State economy, Rural Technology Initiative, 2007
- Examination of the economic Contribution of Alternatives under consideration in the WADNR South Puget Forest Land Plan, WADNR 2009
- Green Meadows Timber Sale documents(Public Auction Book 883, Notice of Sale, Timber Sales Contract, Timber Sales Map), WADNR 2009
- Sun Beam PC scale sale (Merrill & Ring FPLP) sales invoice, scale tickets, load tickets, contract, WADNR 2009
- Lanky Sort contract harvest sale (Stella Jones) sales invoice, scale tickets, load tickets, contract), WADNR 2009
- Cougit lump sum sale (Sierra Pacific Ind.) sales invoice, scale tickets, load tickets, contract, WADNR 2009
- WA State Benefits Packet, WADNR July 2009
- WADNR Training Calendar, WADNR October 2009
- WADNR Contract Harvest Program, WADNR October 2009
- WADNR Public Education Packet, WADNR November 2009
- GIS (SUVT and ArcMap) update, WADNR May 2009
- South Puget HCP Planning Unit forest growth and harvest levels, WADNR November 2009
- Yield of Special Forest Products for South Puget Sound Region, WADNR March 2006
- Forest Road Guide, WADNR 2009
- Habitat Conservation Plan for State Trust Lands 2008 Implementation Monitoring Report, WADNR August 2009
- A Strategy for Northern Spotted owl Dispersal Habitat in the South Puget HCP Planning Unit, WADNR June 2009
- Washington Mill Survey 2006, WADNR December 2008
- Timber sales contract Inadvertent Discovery Clause for cultural resources, WADNR September 2009



- Timber Sale Removals, WADNR FY09
- SEPA (State Environmental Policy Act) Website & Citizen's Guide to SEPA Review and Commenting, WADNR 2009
- Commissioner's Tribal Order, WADNR
- Habitat Conservation Plan, WADNR 1997
- Management of Landslide Risks, WADNR 2009
- South Puget Sound Forest Land Planning Public Outreach Info, WADNR 2008
- Sustainable Recreation Work Group Packet, WADNR 2009
- Marbled Murrelet HCP concurrence letter for SP Planning Unit, WADNR July 2009
- Planning and Tracking System, updated code change, WADNR November 2008
- DEVELOPING WESTSIDE SILVICULTURAL PRESCRIPTIONS: An Inter-Active Self Study and Reference Pamphlet, WADNR March 2007
- Policy for Sustainable Forests, WADNR 2006
- Seed Orchard Program Overview, WADNR
- Strategic Plan for Wildland Fire Protection, WADNR April 2006
- SLGRR (State Lands Geologist Remote Review), WADNR 2009
- SLIPS (shallow landslide initiation point screen) Geological Society of America Abstract Presentation, WADNR October 2009
- Grazing Lease Packet, WADNR 2009
- Timber Sales Users Manual, WADNR June 2009
- Procedure 14-006-090 Management of Forest Stand Cohorts, WADNR June 2009
- Enumclaw and Green Mountain RMAP Plans, WADNR 2009
- WA Forest Practices Act, WADNR
- Reports (FY09Silviculture, FY09Herbicide, FY09Planting, FY10Volume, WADNR November 2009
- ESHB1216 (Engrossed Substitute House Bill), WA Legislature April 2009
- WA Mill Survey, WADNR December 2008
- Asset Management Council Presentation to BNR, June 2008

18.3 - On-site visit(s)

During the audit, one day was spent interviewing stakeholders. The audit team spent one day in the headquarters of the Washington Department of Natural Resources (Olympia, WA) reviewing documents and interviewing staff. Two days were spent auditing 25 field sites as listed below.

	Block/Feature	Acres	Ha	Note
1	Yuhu	62	25	2008 VRH, 2009 hand plant
2	BB West U4	21	8	2008 Shelter Removal, 2009 hand plant
3	Simon Sorts	99	40	2009 VRH
4	GM1 RMAP	0	0	Fish passage barrier replacement, Re-route main line from wetland



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5	Twice Forgotten	88	36	2009 VRH - Active sale
6	Green Mountain Horse Camp	n/a	n/a	Public Use Site, Volunteerism, Collaboration with user groups
7	Mission Bearable U2	17	7	2009 VRH, down woody debris
8	Good Seed U5	98	40	2008 VRH, 2009 Hand plant, 2009 survival survey scheduled
9	Howelling Hurd U1	30	12	2006 Select Prod, 2009 VRH
10	Howelling Hurd U3	53	21	2008 Select Prod, 2009 VRH
11	Square Plot U1	84	34	2006 VRH, 2007 Hand plant, 2009 survival survey, 2009 Hand plant
12	Barbed Shroom Pole U1	24	10	2009 Select Prod Pole harvest - high value product
13	Bear Creek VDT U1	52	21	2009 harvest - VDT, 2009 hand plant
14	Bears Ridge PCT	31	13	2006 PCT
15	West Dragon VDT	26	11	2009 harvest - VDT, NSO habitat
16	Charley Creek NAP	2,019	808	Natural Area Preserve
17	5620 Road Fish Passage	n/a	n/a	Fish Passage Barrier Removal and Abandonment
18	Yeti Hardwood 3	16	6	1999 VRH, 2008 verify target survey
19	Vanilla Bean	62	25	2005 VRH, 2009 hand cut, 2009 ground herbicide, wetlands buffered, regen release, cut configuration
20	Weald U1	42	17	2009 VRH, 2009 ground herbicide, extensive tree retention
21	Weald U4	13	5	2009 VRH, 2009 plant fir and cedar
22	Perry Creek U1	24	10	2008 PCT
23	Copper Ridge 2Aged	39	16	2002 VRH, 2009 hand cut (15 acres)
24	McClane 2008 U1	5	2	2005 Select Prod, 2009 pest management
25	Sleeper U1	60	24	2003 VRH, 2009 veg com survey

The selection of field sites was based upon a desire to assess all phases of forest management. Therefore sites were chosen which represented typical forest management harvests under the predominant silvicultural system being used; Variable Retention Harvesting. Additionally sites were chosen based upon the renewal and tending treatments being employed with a focus on both forest planting and herbicide applications. The auditors also selected a number of fish passage restoration projects along with a natural area and a road abandonment project.

All harvest areas were inspected to determine their condition; whether there had been any significant soil disturbance, were boundaries respected, was the site regenerating, was there damage to residual trees.

All areas examined met the forest management standards of the region. On planted sites, seedlings were found to be vigorously growing. One of the site visits was a revisit to areas where seedlings were chlorotic and growing poorly during the initial audit. Two years later the fir stock is still chlorotic but is growing well.



The Green Mountain Horse Camp was visited to demonstrate how the WADNR leverage volunteer time from recreationists.

18.4 - Interview(s) of involved people met

Manager(s):

- Mr. Clay Sprague - Deputy Supervisor of Uplands
- Mr. Jed Herman - Division Manager, Forest Resources & Conservation Division (FRCD)
- Ms. Tami Miketa – FRCD Assistant Division Manager, Ecosystem Services Section
- Mr. Angus Brodie - FRCD Assistant Division Manager, Data Stewardship Section
- Mr. Jon Tweedale – FRCD Assistant Division Manager, Product Sales Section
- Mr. Mark Thibo - Assistant Region Manager, South Puget Sound (SPS) Region
- Mr. Doug McClelland - Assistant Region Manager, SPS Region
- Mr. Bob Johnson – Assistant Region Manager, Pacific Cascade (PC) Region

Employee(s):

- Ms. Lislie Sayers – FRCD, Ecosystem Services Section, Program Implementation Lead, Forest Certification
- Mr. Allen Estep - FRCD, Ecosystem Services Section Program Lead PSF / Certification
- Mr. Dave Lorence, Timber Sales Manager, SPS Region
- Mr. Dave Dennis, Forester, SPS Region
- Mr. Jesse Sims, Recreation Manager, SPS Region
- Mr. Lee Roach, Compliance Forester, SPS Region
- Mr. Brian Ballard, Forest Manager, SPS Region
- Mr. Alan Mainwaring, Biologist, SPS Region
- Ms. Kelly Heintz, Natural Areas, SPS Region
- Mr. Sam Jarrett, Recreation Manager, SPS Region
- Mr. Mike Davies, Recreation Manager, SPS Region
- Mr. Scott Sargent, District Manager, PC Region
- Ms. Leanne Krein, Silviculturist, PC Region
- Mr. Chris Razor, Intensive Management Coordinator, PC Region
- Jim LeJeune, Forester, PC Region

18.5 - Stakeholders identification and consultation

Six stakeholders were chosen from the list provided by Washington DNR. Emphasis was on stakeholders who did not participate in consultations for the initial audit. The stakeholders included one environmental group, one aboriginal land trust, one logging company, two sawmills and one FSC group manager.



Interviews (in-person and by phone) with stakeholders focused on relationships with WADNR, communications with WADNR, outstanding issues, merit of the certificate, and WADNR billing practices. All stakeholders expressed satisfaction with WADNR and were more concerned with recent staff and budget reductions at WADNR than they were with South Puget FSC Certification.

18.6 - Other evaluation techniques

None Employed

18.7 - Total man days for the audit

The audit required seven man-days to be completed. Six man-days were spent auditing Washington DNR directly and included four man-days in the field auditing management activities. One day was spent consulting stakeholders.

18.8 - Changes since last audit

On September 28th 2009 the Washington Department of Natural Resources acquired 8,361 ha (20,660 ac) of forestlands within the South Puget HCP Planning Unit resulting in total planning unit hectares certified being 66, 891 (165, 660 ac). These new lands were visited and inspected during the audit.

Over the past year there have been some significant changes at the Washington Department of Natural Resources. Significant staff reductions have occurred. The management team responsible for forest certification has a new Division Manager; it is expected that the certification program will remain effective as core staff continue to manage the program.

18.9 - Surveillance audit closing meeting

A closing meeting was held which has re-affirmed the clearance of previously issued Corrective Action Requests from the previous surveillance audit. One minor CAR was issued during the audit.

19 - Referential

19.1 - Forest management referential used for the initial audit

No changes have occurred to the Pacific Coast US standard since the initial audit.

20 - Audit team observations



The audit team selected 25 sites to visit based on the range of silviculture and operations being carried out. WADNR staff put together all the pertinent information in excellent field packages. This is a tribute to the quantity and quality of information the WADNR uses.

Over the two days in the field, auditors examined harvest areas, planting sites, aesthetic areas, roads, water crossings, natural areas and recreation sites. Consistent for all sites was excellent implementation of the planned activities. Harvest and regeneration activities were found to be effective in renewing the next forest. Roads and water crossings were found to be effectively built and maintained.

One corrective action was issued during the 2008 surveillance audit. WADNR staff presented the audit team with extensive information regarding the sale and billing of timber sales. Additionally, the WADNR presented evidence with regards to a recommendation made in 2008 to quantify economic impacts of their operations. The Department is complimented on the quality and extent of evidence provided to the audit team.

CAR #	CAR description	P&C indicator number	Action taken by the entity to close the CAR	Closed/ Open	Date of closure
07	Ensure that invoices for FSC timber include the product group (FSC Pure) and the certificate number	FSC-STD-40-004v2/6.1.1	Invoices for all types of sales include certificate number and product type.	Closed	November 19, 2009

During the audit, a variety of invoices were examined. Invoices were examined along with all the related sales documentation for Sun Beam PC, Lanky Sorts #1 and Cought timber sales. In all cases the invoices now contain the certificate number and product type.

21 - Proposals regarding the certification decision

21.1 - Description of new recommendations

No recommendations are being put forth.

21.2 - New Minor Corrective Action Requests

One minor Corrective Action Request was made during the audit. Shipping documents (load tickets) for FSC timber sales do not currently contain the required chain-of-custody information. Load tickets for FSC certified timber must include the product group and the WADNR FSC certificate number.



N°	Minor corrective action requested	Proposed date of implementation	Requirement number
08	Ensure that shipping documents for FSC timber include the product group (FSC Pure) and the certificate number	May 18, 2010	FSC-STD-40-004v2/6.1.2

Upon inspection of load tickets it was noted that neither the product type or the certification number were present – as is required by the FSC Chain-of-Custody standard. On May 16, 2010 the lead auditor was provided with the evidence to clear this corrective action request. Sample shipping documents were provided for review and were found to be acceptable.

21.3 - New Major Corrective Action Requests

No major Corrective Action Requests were issued.

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

It is the opinion of the audit team that the Washington Department of Natural Resources continues to meet the requirements of the FSC forest management standard for the Pacific Coast of the USA. All outstanding minor Corrective Action Requests have been addressed and closed. The certification of the Washington State Department of Natural Resources South Puget HCP Planning Unit should continue.

22 - Certification decision

After analysis of the conclusions of the audit team and after revision of the Corrective Action Request, the Wood and Forestry department decides to maintain the FSC Forest Management of the company.

Nevertheless the company shall implement the necessary actions to answer the minor CAR and to maintain the compliance to the FSC standard.

Issued December 10, 2009; and finalized July 19, 2010.

FSC Product Manager,

Héloïse D'HUART

Lead Auditor,

Brian CALLAGHAN



D. Surveillance Audit 3

A third FSC forest management surveillance audit of the Washington Department of Natural Resources' South Puget HCP Planning Unit was undertaken from November 1 to 4, 2010. The purpose of the audit was to check on the Corrective Action Requests issued during the previous audits, monitor compliance with FSC Pacific Coast (USA) standard, and consult with stakeholders. The scope of the audit has not changed as the WA DNR does not have any changes in the ownership since the last surveillance audit.

23 - Base of evaluation

23.1 - Date of the surveillance evaluation

November 1st to 4th 2010

23.2 - Composition of the audit team

- Lead auditor:**
- Vincent Corrao, Certified Forester, RAB EMS Lead Auditor and FSC FM qualified Lead auditor on behalf of Bureau Veritas Certification. Mr. Corrao has expertise in forest policy, forest planning, Native American relations and forestry best management practices. He has been auditing forest management under a variety of standards for the past ten years.
- Auditor:**
- Greg Bassler, Certified Forester, RAB EMS Lead Auditor and FSC FM qualified auditor on behalf of Bureau Veritas Certification. The auditor is trained as a logging engineer with extensive experience in transportation systems, harvest operations and silvicultural systems. He has been auditing under a variety of standards for 5 years.

24 - Information collecting modalities

24.1 - Description of the audit program

The audit was carried out over four days. On November 1st the audit team spent the first day reviewing documents for Principles 3, 5, 6, 8 and 9. The one minor CAR issued during the 2009 surveillance was reviewed. This CAR (08) had previously been cleared in May and was closed during this audit. Additional issues relating to the operation of their certificate and the chain of custody were discussed. November 2 was spent interviewing stakeholders with the focus on those organizations who had yet to provide input into the audit process. November 2nd and 3rd were spent in the field examining operations. November 4 was spent reviewing additional documentation and performing the closing meeting. The audit schedule is provided below.



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AUDIT SCHEDULE			
PERSON	TIME	PLACE	ACTIVITY
November 1, 2010			
Corrao, Bassler, Auditors	10:00 AM	WADNR Office; Olympia, WA	Opening Meeting with Tami Miketa, Allen Estep, Lislie Sayers
Corrao, Bassler, Auditors	10:30 AM	WADNR Office; Olympia, WA	Review logo use, review chain-of-custody process, review progress on outstanding CARs, stocking mortality and VRH discussions. Document review P 3, 5, 6, 8, & 9.
Corrao, Bassler, Auditors	6:30 PM	WADNR Office; Olympia, WA	Daily debrief and depart
November 2, 2010			
PERSON	TIME	PLACE	ACTIVITY
Corrao, Auditor	8:30 AM	WADNR Office; Olympia, WA	Stakeholder Interviews
Bassler, Auditor	8:30 AM		Depart Olympia for field sites
Bassler, Auditor	9:00 AM	Capitol Forest - Sterling, Discovery, Rock Candy, Cedar Flats	VRH, planting, vegetation management, recreation plan & site upgrades, ORV misuse, collaboration efforts with contractors/stakeholders, new bridge, water re-route
Corrao, Auditor	12:00 PM	WADNR Office; Olympia, WA	Continue Review Principles 3, 5, 8, and 9
Bassler, Auditor	12:00 PM	Capitol Forest - Tie, C9000/C9200, Dr Pepper, and Wee	VRH, site prep, fish barrier removal, Road Maintenance and Abandonment Plans, water quality re-route, active VRH, site prep, wetlands, site prep, pipe replacement, planting, survey, aerial application
Bassler, Auditor	4:30 PM	Capitol Forest Frontage Road	Daily debrief and depart
Corrao, Auditor	5:30 PM	WADNR Office; Olympia, WA	Daily debrief and depart
November 3, 2010			
PERSON	TIME	PLACE	ACTIVITY
Corrao, Bassler, Auditors	7:45 AM		Depart Olympia for field sites



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AUDIT SCHEDULE			
PERSON	TIME	PLACE	ACTIVITY
Bassler, Auditor	9:30 AM	Elbe / Tahoma Forest - Sarah Creek Campground, Giddy Up Sorts, National Townsite, Whiskers, Crestview, School House,	Logging in recreation areas, public collaboration, VRH, sort sale, HCP Northern Spotted Owl Dispersal strategy, Cultural Resources Program/Process, field GIS tools, Cultural Resources training, planting, survey, natural regeneration, high value species goals, active timber sale, skid trail requirements, mitigation, utilization, mortality, watershed analysis overview
Corrao, Auditor	9:00 AM	Sherwood Forest/Green Mountain - Penny Sorts, Green Meadows, Simon Sorts, Twice Forgotten, Stavis NRCA	VRH, special forest products, planting, survey, RMAP (road maintenance and abandonment plans), contract harvest, stream protection, leave trees, biomass, public use planning, bald protection, rock pit, marbled murrelet, cliff protection, high conservation value forests, shoreline restoration project, old growth process, thinning in conservation areas
Bassler, Auditor	5:00 PM	Elbe / Tahoma Forest - School House	Daily debrief and depart
Corrao, Auditor	5:00 PM	QFC- Belfair site	Daily debrief and depart
November 4, 2010			
PERSON	TIME	PLACE	ACTIVITY
Corrao, Bassler, Auditors	8:00 AM	WADNR Office, Olympia, WA	Licensed pesticide applicators, forest practices rules, VRH, green-up
Corrao, Bassler, Auditors	11:15 AM	WADNR Office, Olympia, WA	Closing Meeting with, Jed Herman, Tami Miketa, Allen Estep, Lislie Sayers

24.2 - Documents review

The WA DNR has extensive documentation on the processes implemented in the management of the resources.

WADNR 2010 FSC Audit_Documents Reviewed
Annual Report, DNR (2009)
The Goldmark Agenda – Strategic Plan 2010-2014, DNR (April 2010)



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- Email / Press Release: Commissioner announcement of release (April 2010)
- Email: Direction from Leonard Young, Department Supervisor w/examples from Aquatics Division and Olympic Region (April 2010)
- Spreadsheet: Meetings w/ Division and Region staff to gather input (Nov 2009)
- Website / Press Release: Public stakeholder meetings (Feb 2010)
- Concept Paper: OESF contribution to meeting DNR's strategic Plan (January 2010)
- GIS Softcopy Photogrammetry 3-D GIS systems (May 2010)

State Trust Lands Map, DNR (2010)

Policy for Sustainable Forest Draft EIS, DNR (April 2005)
Policy for Sustainable Forest Final EIS, DNR (June 2006)
Policy for Sustainable Forests (PSF), DNR (December 2006)

PO14-001 Financial Diversification

PO14-002 Financial Assumptions

PO14-003 Definition of Sustainability for the Sustainable Harvest Calculation

PO14-004 Recalculation of the Sustainable Harvest Level

PO14-005 Harvest Deferral Designations

PO14-006 Forest Health

PO14-007 Catastrophic Loss Prevention

PO14-008 Old-Growth Stands in Western Washington

PO14-009 Wildlife Habitat

PO14-010 Watershed Systems

PO14-011 Riparian Conservation

PO14-012 Special Ecological Features

PO14-013 Genetic Resource

PO14-014 Public Access and Recreation

PO14-015 Visual Impacts

PO14-016 Cultural Resources

PO14-017 Local Economic Vitality

PO14-018 Forest Land Planning

PO14-019 General Silvicultural Strategy

PO14-020 Forest Roads

PO14-021 Research

PO14-022 External Relationships

PO14-023 Implementation, Reporting, and Modification of the Policy for Sustainable Forests

Sustainable Harvest Calculation:

- Final Environmental Impact Statement for the Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington, DNR (July 2004)
- Addendum to the Final Environmental Impact Statement, DNR (2007)
- Draft Environmental Impact Statement for the Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington, DNR (Nov 2003)
- Sustainable Harvest SEPA Public Scoping Comments & DNR Responses, DNR (August 2002)
- 4-year review on Sold Timber Sales FY05-08, DNR (October 2008)
- 5-year review on Sold Timber Sales FY05-09, DNR (October 2009)

Economic and Revenue Forecast – Fiscal Year 2010 – 3rd Qtr, DNR (Sept 2010)

Plan: South Puget Forest Land Plan:

- SPFLP FEIS: South Puget HCP Planning Unit Forest Land Plan FEIS and Executive Summary (January 2010)
- SPFLP FEIS Appendix C: Forest Management Modeling, DNR (January 2010)
- DEIS: South Puget HCP Planning Unit Forest Land Plan DEIS (July 2008)
- Report: A Summary of the Current Forest Management Strategies for the South Puget HCP Planning Unit, DNR (November 2008)



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Ref: PR080501US
Version: 5.1

- SP FLP input/output matrix/ working paper An examination of the Economic Contribution of the Alternatives under consideration in the WADNR SPFLP (Sept 2009)(Rural Technology Initiative Working Paper 9 (Jobs, Revenues, and Taxes from Timber Harvest; An Examination of the Forest Industry Contribution to the Washington State Economy (Sept 2007)
- Letter: NSO Habitat Definition Changes in DNR's SP HCP Planning Unit WEC vs. Sutherland Settlement Agreement Approval) (March 2010)

Forest Land Planning Public Process Example:SPS Scoping: Local Knowledge / Stakeholder workshops: agenda, meeting announcements to stakeholders and tribes, outcomes, stakeholder outreach list, scoping meeting info, response to scoping comments, determination of significance, focus of EIS document

SEPA Website (Nov 2009)

SEPA Guide: Citizen's Guide to SEPA Review and Commenting (Nov 2009)

Agreement: Settlement Agreement on SHC, DNR (April 2006)

The Future of WA Forests, DNR (2007)

Survey: WA Mill Survey 2006; DNR (Dec 2008)

Email: FSC Post Audit Documentation – average annual cut / annual growth for south Puget, DNR (August 2007)

Memo: FSC Estimates of forest growth and harvest levels for South Puget Planning Unit, DNR (Nov 2009)

WAC 332.52: Public access and recreation

Tahuya State Forest Recreation Plan: Tahuya State Forest (SPS Region) - Recreational Use and Demand for The Tahuya State Forest, Gilmore Research Group (Jan 1991)

Tahuya State Forest Public Use Assessment: A Needs Assessment for the Tahuya State Forest, Homer Staves Consulting (Sept 2005)

Recreation Planning: Green Mountain / Tahuya Forest, DNR (Oct 2010)

- Recreation website
- Map of area, DNR
- Ear to the Ground

HCP:

- Final Habitat Conservation Plan, DNR (September 1997)
- Draft Habitat Conservation Plan, DNR (March 1996)
- DEIS for the HCP, DNR (March 1996)
- FEIS for the HCP, DNR (October 1996)
- Incidental Take Permit for the HCP, USFWS (January 1997)
- Biological Opinion for the HCP, USFWS (January 1997)

SEPA Checklist Resource Guide (March 2009)

- SEPA Handbook, DNR (Sept 2010)
- DNR Timber Sales Environmental Checklist, DNR (Sept 2010)

Wildfire Fuels Reduction Contract, Invitation to Bid – Greenwater Project, DNR (Nov 2010)

NatureServe Websites (NatureServe, Explorer, LandScope) (Oct 2010)

RCW 79.70 NAPs and 79.71 NRCA (4.19.09)

Website: DNR's Natural Areas Program Information

- Natural Area Preserves locations (October 2010)
- Natural Resource Conservation Areas locations (October 2010)

Strategy: Interagency Strategy for the Pacific Northwest Natural Areas Network; Forest Service, PNW, DNR (July 2009)

Map: WA Natural Areas (April 2010)

Natural Heritage Plan, DNR (2007/2009 Update)

Natural Heritage Program Info:

- Website: Washington Natural Heritage Program (Oct 2010)
- Website: Natural Heritage Advisory Council (Oct 2010)
- Website: Natural Heritage; Conservation Partners (Oct 2010)
- Website: Natural Heritage Projects (Oct 2010) *projects not printed*
- Website: Natural Heritage Products & Services (Oct 2010)
- Document: Natural Heritage Washington Herp Atlas (June 2009)



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- Website: Natural Heritage Reference Desk – Available Information, DNR (Oct 2010)
Example :Natural Heritage Reference Desk Rare Plants Information
Example Natural Heritage Reference Desk Ecological Communities Information
Example Natural Heritage Reference Desk Rare Animals Information
Example Natural Heritage Reference Desk GIS data
Example Natural Heritage Reference Desk Publications
 - Field Guide: Draft Field Guide to Ecological Systems (February 2008)
- Stavis NRCA:
- Management Plan: Stavis Natural Resources Conservation Area Management Plan, DNR (DRAFT December 2009)
 - Presentation: Stavis NRCA – Nearshore Restoration Project, DNR (2010)
- Factsheet Q&A : Washington State’s Natural Areas Program, DNR (May 2010)
- Developing Westside Silvicultural Prescriptions An Inter-Active Self-Study and Reference Pamphlet, DNR (March 2007)
- Forestry Handbook Procedures, Guidelines, Direction, Tasks; DNR (dates vary)
- DEVELOPING EASTSIDE SILVICULTURAL PRESCRIPTIONS: An Inter-Active Self-Study and Reference Pamphlet, DNR (January 2007)
- Western Washington Forest Practices Application/Notification, DNR (September 2009)
- Contract Examples: Intensive Management (herbicide, hand cut, planting, pct)
- FPARS (Forest Practices Public Review System), DNR (Nov 2009)
- Timber Sales Contract Reference Manual (March 2008)
Timber Sales Contract Clause Admin Manual (November 2008)
Logging Plan of Operations (Oct 2010)
- Nursery Mortality 2010:
- Report: Summary of Webster Nursery Seedling Damage Issue, DNR (May 2010)
 - Guide: Freeze Damage, DNR (2010)
 - Report: Budget for replanting, DNR (2010)
 - Report: Survey Status, DNR (10.20.10)
 - Data: Initial Survey Data, DNR (Draft Oct 2010)
- Noxious Weeds:
- RCW 17.10 Noxious Weeds Control Boards
RCW 17.10.007 Purpose – Construction
RCW 17.10.010 Definitions
RCW 1710.145 State Agencies duty to control spread of noxious weeds
 - DNR Procedure PR 14-006-050 Controlling Invasive Plants and Noxious Weeds (2007)
 - WA State Noxious Weed Board Info (About Us, Role, Laws, Noxious Weed List) (2009)
 - Website Example: King County Noxious Weed Project (2009)
- FRIS: Forest Resources Inventory System:
- Field Procedures: Natural Resources Field Procedures Forest Resource Inventory System (FRIS), DNR (June 2002)
 - Refresh Process: DNR FRIS Refresh Process Document, DNR (June 2009)
 - Dictionary: FRIS2 Data Dictionary, DNR (June 2009)
 - Update: FRIS Update Summary v1.1 (January 2010)
 - Refresh: FRIS Refresh notice (March 2010)
 - Status Report: FRIS Status Report - Comparison of the 2006 and 2010 FRIS Updates for DNR Trust Lands (August 2010)
 - Summary: How to use Lidar to inventory forest stands (Dec 2008)
- Report: Potential Impacts of FSC Criterion 6.6 on DNR Managed Lands, DNR PC Region (August 2009)
- Website: Silviculture PC Region w/examples of planning for treatments, DNR (Oct 2010)
- Old Growth packet:
- Definition and Inventory of Old Growth Forests on DNR-Managed State Lands, DNR (June 2005)
 - Extent and Distribution of Old Forest conditions on DNR-Managed State Trust Lands in Eastern Washington, DNR (December 2007)
 - The Case for Active Management of Dry Forest Types in Eastern Washington: Perpetuating and



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- Creating Old Forest Structures and Functions, DNR (September 2008)
- Procedure PR 14-004-045 Old Growth Timber Harvest Deferral and Protection (Westside)
- Procedure: PR 14-006-091 Retention and Perpetuation of Legacy Trees, Snags and Downed Wood (Eastside)
- SharePoint site for Westside Old-growth, DNR (Oct 2010)
- Westside old growth assessment package: includes assessment description, decision pathway, assessment form, secondary screening information, DNR (Oct 2010)
- Report: Acres of Potential Old Growth and Older Forests in South Puget Sound HCP Planning Unit w/WOGHI attribute definitions, DNR (May 2007)
- Westside Old Growth FAQs, DNR (no date)

Field Guide: Managing Wetlands on State Forest Lands in Washington (June 2000)

Guide: Recognizing Wetlands and Wetland Indicator Plans on Forests in Washington (June 2000)

DNR Contract Harvest Program

- RCW 79.15.500 Contract harvesting – Definitions
- RCW 79.15.510 Program established
- Fiscal Note Questionnaire: outlines request for HB3046 (RCW 79.15.510)
- Report: A Report to the Legislature Contract Harvesting Program (Sept 2006)
- List: Contract Harvest Logger List (July 2010)
- Request for statement of qualifications (RFSOQ)
- Harvester Statement of Qualifications Evaluation Score sheet
- Evaluation of Contractors Performance – completed by the CA
- Contractors Harvest Reference Sheet – used to call for references prior to putting on the list.

Public Auction Sale of Timber Book, DNR (Nov 2010)

Washington State Forest Practices Rules 2002, Guidebook, 2002

Washington State Forest Practices Guidebook, DNR updated 6/8/2009

Seed Orchard Program Info

Webster Nursery Program Info, DNR (May 2008)

Variable Retention Harvest (VRH) related to FSC:

- PSF Policy: PO14-010 WATERSHED SYSTEMS (2006)
- Forestry Handbook Procedure PR 14-005-050 Maximum Size for Even-Aged Final Harvest Units (Dec 2009)
- Letter: DNR letter to Bureau Veritas (March 19, 2008)
- Data: Average Acre Size – presented 2007
- Data: Average Acre Size – presented 2008
- Data: Average Acre Size – presented 2009
- Data: Average Acre Size – presented 2010 w/ list of sales & compared years
- Publication: conserving Forest Biodiversity – A Comprehensive Multi-scaled Approach (Jerry F. Franklin's Scientific Data on Clear-cut Acre Size)
- Data: Harvest Deferral (FY11) Report: FSC 6.3.e.5 Pre-harvest basal area retention

Brochure: Identifying Mature and Old Forests in Western Washington by Robert Van Pelt, June 2007

Timber Sales New Business Ventures:

- Website: Timber Sales internet page with New Business Ventures section including forest products opportunities for new markets and small forest products purchasers (Oct 2010)
- Website: DNR internet New Business Opportunities in Forest Products (Oct 2010)
- Auction TBS appraisal list: example of contract harvest TBS (Penny Sorts) and display of advertised Region TBS that are valued at between \$25k and \$250k (May 2010)
- Timber Notice of Sale: (Penny Sorts) displaying diversity of products (May 2010)

Restrictions on sale of valuable materials by DNR:

- WAC 240-15 Log Export restrictions
- Website: Department of Revenue, Log Export Regulations
- RCW 79.15.010, Valuable Materials Sold Separately
- RCW 79.15.110, Conduct of Sales
- Evaluation of Restrictions on Eligibility to Purchase State Timber Sales in Washington, (February 7, 2001)

Direct Sales Packet:



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- RCW 79.15.050, Type of sale – Direct sales
 - BNR Resolution 1229 – Direct Sales
 - Procedure PR-11-000-01 Direct Sale (June 2007)
 - Region Direct Sales Instructions and Appraisal Form
 - Process: SPS Region Direct Sales Packet
 - List: SPS Region Direct Sales Agreement Numbers List – Sales that have occurred (2010)
- Seed Zone Manual, DNR (2002)
- Guide: Forest Roads Guide , DRAFT (2010)
- Report: *A Report to the Legislature: Road Maintenance and Abandonment Plan Checklist Report*, (WAC 222-24-050, RCW 76.09.420(4) DNR Forest Practices Division (Dec 2008)
- Road Plan: Example NW Region
- RMAPS: South Puget Sound (Enumclaw/Green Mountain)
- Forest Practice Rule for Roads: Chapter 222-24 WAC Road Construction and Maintenance
- RFRS: Habitat Conservation Plan Riparian Forest Restoration Strategy (RFRS) (April 2006)
- RFRS Adaptive Management, DNR:
- Concurrence Letter: USFWS/NOAA_Riparian, activities in 70+ years (April 2010)
 - Variance: Big Beaver Timber Sale – SPS Region (January 2007)
 - Variance: Whiskers Timber Sale – SPS Region (January 2008)
 - Email: Update on 70+ (ID sales in NW/SPS) (Sept 2010)
 - Memo: Update South Puget Sound Region Riparian Forest Restoration Activities (Oct 2010)
- Report: Washington Timber Harvest Report 2009, DNR
- FSC Certification HCVF Info, Principle 9: - Memo: to BV (May 2007) Principle #9 HCVF
- Report: Timber Sales Summary by Region (Sold/Removed/Remaining Volume), DNR FY09 - FY10
- Report: SP HCP Planning Unit, Summary of Activities FY10 for FSC
- Report: Report: South Puget Sound HCP Planning Unit Prescription Summaries, Activities, Activity Objectives and Completed Comments for FMUs that had any Silvicultural Activity, other than Surveys, Completed between 9/1/09 and 9/30/10
- Report: Oct 2010 Sales results
- Report: SHC vs Sold and Removals, Oct 2010
- Forest Practices Compliance Program: (FP WACS and FP HCP)
- Website: DNR's Compliance Monitoring Program Objectives (May 2010)
 - Report: TFW (Timber Fish & Wildlife) Implementation Committee (recommendations for sampling, field protocols, limitations and damage control)
 - Sustainable Harvest 5-year review on Sold Timber Harvests (October 2009, Brodie)
 - Manual: DNR's Compliance Monitoring Description (Jan 2010)
 - Manual: DNR's Compliance Monitoring Protocols (March 2010)
 - Report: Forest & Fish Report (April 1999)
- Report: DNR's Forest Practices Division Compliance Monitoring Report 2006-2007 (March 2009) *with RIF and change of program the updated report will be available in Nov 2010)*
- WDFW Compliance Monitoring: (DNR's HCP)
- Report: WDFW Compliance with DNR's State Lands Habitat Conservation Plan (HCP) 2006-2007 (February 2007)
 - Report: WDFW Compliance with DNR's State Lands Habitat Conservation Plan (HCP) 2006-2007 (DRAFT June 2009)
- DNR's State Lands Effectiveness Monitoring: (DNR's HCP)
- Website: [Enhancing Spotted Owl Habitat Through Variable Density Thinning](#)
 - Report: [Spotted Owl and Barred Owl Resource selection in Southwestern WA, Progress Report WDFW?](#) (Feb 2010)
 - Website: [Monitoring of Instream Habitat Conditions and Trends](#)
 - Website: [Studying Riparian Silviculture Treatment Alternatives](#)
 - Website/ Report: Effectiveness Monitoring of Water Quality Mill Creek and Abernathy Creek sub-basins Columbia HCP Planning Unit (November 2004)
- DNR's State Lands Implementation Monitoring: (DNR's HCP)
- Website: Implementation Monitoring (May 2010)
 - Report: Habitat Conservation Plan 5-Year Comprehensive Review (May 2004)



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- Report: Habitat Conservation Plan FY2009 Annual Report (March 2010)
 - Email: Info on FY 2009 Annual Report (budget reductions, new format) (May 2010)
- DNR - Coop membership examples;
- Northwest Tree Improvement Cooperative Report, OSU (Sept 2009)
 - Pacific Northwest Tree Improvement Research Cooperative, PNW (May 2010)
 - Intermountain Forest Tree Nutrition Cooperative, University of Idaho (May 2010)
- Performance Measures – internal / external DNR 4th Qtr (April –June 2010)
- Management System – Implementation Monitoring (December 2009)
- Meeting Notice: Prioritize Monitoring– Internal
 - Email: Prioritize Externally w/ Services
 - Meeting / Email: Gather input on Draft w/ Management
 - Review Results w/ Regions
 - Publish Report: Notification to Mgmt and Staff regarding FY2009 Trust Lands HCP Annual Report (5.20.10)
- Management System – Compliance & Enforcement (DNR’s FP, WDFW, USFWS)
- Quarterly summary from FP to SL - received from FP ADM Julie Sackett to Jed Herman FRCD; forwarded to CPL Goldmark
 - Forest Practices Chapter 222-46 WAC, Consultation and Enforcement
 - Quarterly Report prepared by Division staff for Jed Herman FRCD manager. Illustrates process of obtaining information on FP violations on spread sheet, itemizing information from FP documentation and presenting to Deputy Supervisor Sprague. Copy of meeting scheduler where FP deviations were discussed with top management (CPL Gold mark, Dept. Supervisor and Deputy Supervisors).
 - Example management review system of compliance from PC Region
 - Region Compliance Guidance
 - District Guidance
 - Notification and process flow chart for violations
 - Draft Updated Guidance to the above documents
 - Example of 2008 Implementation Monitoring Report identification of compliance issue and documentation in resulting additional training.
- Management System – Adaptive Management Proposal – FRCD, DNR (DRAFT May 2010)
- Management System – Variance Reports 3rd Qtr, DNR (Jan - March 2010)
- Forest Biomass Initiative Supply Assessment: (HB 2465 – implement biomass to energy Pilot Projects Website: Forest Biomass Initiative, DNR (October 4, 2010)
- Forest Biomass Policy: (SSHB 2481 – long-term supply agreements):
- DNR’s Website: Forest Biomass Policy, DNR (October 4, 2010)
 - Policy / Law: Forest Biomass Policy SSHB 2481 (amending RCW 70.02.010, 43.30.020, 76.06.180, 79.15.100, 79.15.220, 79.15.510) an act relating to the DNR authority to enter into forest biomass supply agreements.
 - Biomass Implementation Fact Sheet, DNR (August 2010)
 - Email & initiation of working group to integrate biomass legislation and possible biomass products with current product sales processes and guidance (May 2010)
 - RFP: Request for proposals (Contract for Biomass Study), DNR (September 13, 2010)
- Memo and Summary: Interpretation of the HCP and Related Documents for Unstable Slopes, DNR (December 2006)
- Guidance Draft: Immanent Landslide Threat Reporting, DNR (May 2010)
- WA Forest Practices Rules unstable slopes WAC 222-10-030, WAC 222-16-050.1.d.
- Presentation: Managing Landslide Risk On State Trust Lands, DNR 2008 and 2009 Westside
- WA Forest Practices Board Manual; Section 16, Guidelines (to the rules) for Evaluating Potentially Unstable Slopes and Landforms (November 2004)
- SLGRR (State Lands Geologist Remote Review, DNR (Oct 2009)
- Landslide Hazard Zonation
- Website: Completed Projects (Oct 2010)
 - Project Protocol (2006)
 - Document: Use of the Landslide Hazard Zonation Data (2005)



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<ul style="list-style-type: none"> • Example: Clallam River WAU Landslide Hazard Zonation Project (Nov 2007) • Example: Spada Lake Watershed Landslide Hazard Zonation Project (Nov 2005)
Document: The Role and Responsibilities of Slope Stability Specialists in State Trust Land Management, DNR (Aug 2007)
Wetlands Training Dates/Presentation, DNR (June 2010)
BMP Training: <ul style="list-style-type: none"> • DNR/ AFRC (American Forest Resources Council (Fall 2010) • DNR/DOE (Department of Ecology) (Agenda/Class List/Handout) (Summer 2010)
Tribal Relations: <ul style="list-style-type: none"> • Commissioners Tribal Relations Order, DNR (2010) • Contacts: DNR Contacts and CRT (Cultural Resources Trained Technicians) • List of Tribes w/in WA State, DNR (2010) • Agenda: Tribal Summit, DNR (2010) • Press Release – DNR Tribal Summit (September 2010)
Cultural Resources Program Info: <ul style="list-style-type: none"> • Governor’s Executive Order 05-05: <i>cultural resources review for all capital facilities projects and all land acquisitions for those projects, consultation with affected tribes and DAHP</i> • RCW 27.44 Protection of Indian Graves • RCW 27.53 Archeology Sites and Resources • RCW 42.56.300 Archaeological sites: <i>maps, other archaeological sites, to avoid looting, are exempt from disclosure.</i> • RCW 43.21.c.020 (d) Preserve important historic, cultural, and natural aspects of our national heritage; <i>FP Board adopts by reference the policies of SEPA</i> • WAC 222-20-120 • WAC 222-16-050.1.f., 5.k. • DNR Policy PO08-034 Protect ARCHAEOLOGICAL AND CULTURAL RESOURCES, DNR Ag/Grazing Program, (Dec 2003) • Forestry Handbook Procedure PR14-004-030: Identifying and Protecting Cultural Resources • Land Transactions Procedure PR15-007-024: Conducting Cultural Resource Reviews for Land Transactions • DNR’s Data sharing MOU w/DAHP (Department of Archaeology and Historic Preservation) (January 2008) • GIS Info: description of GIS cultural resources, DNR (April 2008) • SEPA Checklist, DNR (September 2010) • Tribal mitigation correspondence, DNR (June 2009, July 2010)
Grazing Lease 10-a69562, DNR (January 2005)
Tahuya and Green Mountain Special Forest Products, List, Plan, and Maps, DNR (Oct 2010)
WADNR’s Specialized Forest Products Websites (Oct 2010) <ul style="list-style-type: none"> • New Business Opportunities in Forest Products (Oct 2010) • Evergreen Bough Sales from Forested State Trust Lands (Oct 2010) • Brush Sales from Forest State Trust Lands (Oct 2010) • Brush Lease Auction Summary for SPS Region (June, 2010)
SEPA Lists: South Puget Region SEPA Mailing Lists (Pierce County, Elbe Unit, King County, Kitsap County, Lewis County, Mason County, Thurston County), DNR (Oct 2010)
Trust Land Transfer Program Report, DNR (2009-11)
Public Records Act: RCW 42.56
Public Lands RCW 79
Public Recreation Lands RCW 79A
Chemical/Pesticide Use Laws: <ul style="list-style-type: none"> • Washington pesticide control act 15.58 RCW • Washington pesticide application act 17.21 RCW • General pesticide rules 16-228 WAC
SEPA (State Environmental Policy Act): <ul style="list-style-type: none"> • State Environmental Policy 43.21C RCW • WAC SEPA Rules 197-11



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Policy: PO022-001 Law Enforcement, DNR (May 2004)
Policy: PO022-003 Law Enforcement Natural Resources Investigators, DNR (May 2004)
Draft Old Growth GIS Layer, DNR (Oct 2010) <ul style="list-style-type: none"> Description of the Proposed Layer GIS Tracking Workflow GIS Editing Procedure Old Growth Assessment Document Guidelines
State Uplands Viewing Tool (SUVT) Packet, DNR (Oct 2010) <ul style="list-style-type: none"> SUVT Tutorial Print Screens of SUVT format and available layers
MetaData: DNR GIS layers Subject list, DNR (Oct 2010)
Manual: DNR's Planning and Tracking System (P&T) Users Manual, DNR (January 2009)
Licensed Applicator List, Dept of Ag (Oct 2010)
An Examination of the Economic Contribution of Alternatives under consideration in the WADNR South Puget Forest Land Plan, DNR (Sept. 2009)
Rural Technology Initiative Working Paper 9 Jobs, Revenues, and Taxes from Timber Harvest; An Examination of the Forest Industry Contribution to the Washington State Economy (September 2007)
Report: Average Stand Age for FY2011 Regeneration Harvests in SP Planning Unit, DNR (Nov 2010)
Scale Sale: Sun Beam PC, Contract 30-082548, Invoice, Scaling Bureau Report, Completed Load Ticket (March 2009)
Contract Harvest Sale: Penny Sorts 2, Contract 30-085333, Invoice, Scaling Bureau Report, Completed Load Ticket (June 2010)
Lump Sum Sale: Twice Forgotten, Contract 30-082629, Invoice, Call-Log (June 2009)
FSC promotional logo usage approval spreadsheet w/artwork, DNR (Oct 2010)
FSC License Agreement for the FSC Certification Scheme, DNR (July 2010)
WADNR's FSC Certificate, DNR (expires May 2013)

24.3 - On-site visit(s)

During the audit, one day was spent interviewing stakeholders. The audit team spent one day in the headquarters of the Washington Department of Natural Resources (Olympia, WA) reviewing documents and interviewing staff. Three days were spent auditing 24 field sites as listed below.

WADNR 2011 FSC Audit - Site's Visited					
Site	FMU ID	Block/Feature	Unit Acres	Ha	Notes
1	8434	CEDAR FLATS 3	49	20	1996 CC, 1997 planting, vegetation mgmt
2	63490	TIE U2	55	22	2009 VRH, site prep
3	RMAP	C9000/C9200 Pipe Stop	n/a	n/a	Fish Barrier removal, Road Maintenance and Abandonment Plans, water quality re-route
4	63602	STERLING U2	35	14	2010 VRH
5	63616	STERLING U2	51	20	2010 VRH
6	68311	DR PEPPER U2	15	6	2008 VRH, planting, survey, aerial application
7	71701	WEE U1B	4	2	2008 VRH sale, site prep, pipe replacement
8	66341	WEE U1	39	16	2010 active VRH, site prep, wetlands
9	71604	WEE U1A	25	10	2010 active VRH, site prep, wetlands
10	Recreation	Rock Candy	n/a	n/a	Capitol Forest Recreation Plan, Site Upgrades, ORV misuse - Collaboration with BPA / Williams Pipeline, New bridge, water reroute



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11	29294	WHISKERS PC U1	72	29	2008 VRH, planting, survey, HCP Northern Spotted Owl Dispersal strategy, natural regeneration, high value species goals
12	43497	WHISKERS PC U2	42	17	2008 VRH, planting, survey, HCP Northern Spotted Owl Dispersal strategy, natural regeneration, high value species goals
13	19485	SCHOOL HOUSE U1	60	24	2008 VRH, planting, survey, mortality, Mineral Creek Watershed Analysis overview
14	15656	CRESTVIEW U4	77	31	2010 VRH active site, skid trail requirements, mitigation, utilization
15	19542	GIDDY UP SORTS U2	30	12	2009/2010 VRH, sort sale, HCP Northern Spotted Owl Dispersal strategy
16	74287	GIDDY UP SORTS U3	116	46	2009/2010 VDT, sort sale, HCP Northern Spotted Owl Dispersal strategy
17	Recreation	Sahara Creek	n/a	n/a	Logging in recreation areas, public collaboration
18	Cultural Resources	National Townsite	n/a	n/a	Cultural Resources Program/Process, field GIS tools, CRT training
19	19637	TWICE FORGOTTEN	88	35	2010 VRH, Rock Pit, Marbled Murrelet, Leave Trees, Cliff Protection
20	23734	GREEN MEADOWS U7	35	14	2010 VRH
21	19139	Penny Sorts U1	44	18	2010 VRH, special forest products
22	75083	Penny Sorts U2	9	4	2010 VRH, special forest products
23	38895	Simon Sorts	99	40	2010 VRH, planting, survey, RMAP, Contract Harvest, Type 5 Stream Protection, Leave Tree Design, Biomass, public use planning
24	NRCA	Stavis NRCA	575	230	Natural Resources Conservation Area, shoreline restoration project, Old Growth process, thinnings in conservation areas

The selection of field sites was based upon a desire to assess all phases of forest management. Therefore sites were chosen which represented typical forest management harvests under the predominant silvicultural system being used. The primary silvicultural prescription is Variable Retention Harvesting (VRH). Sites were chosen based upon the type and methods employed and to visit sites with a wide range of activities. Treatments included forest planting, herbicide application, road maintenance and stream crossings. The auditors also selected a number of fish passage restoration projects as well as a number of natural areas and old growth sites.

All harvest areas were inspected to determine their condition and whether there had been any significant soil disturbance or water quality issues. The activities implemented were assessed as to whether they were conducted as planned and whether the sites were regenerating. The post harvest monitoring was also assessed to insure that the post harvest activities were being implemented.

All areas examined were found to be in conformance and met the forest management standards of the region. The planted sites were found to be



growing well in most areas. A late frost at the seedling nursery had damaged some seedlings and poor survival was seen this past summer on some of the units. The WA DNR had conducted special inventories to assess the mortality and has secured additional funds to replant these areas. The draft inventory numbers indicate that the damage may be less than originally expected. The seedlings will be planted this winter on the sites requiring interplanting.

The Stavis Natural Resource Conservation Area restoration project was visited to demonstrate how the WADNR has acquired a low elevation Douglas Fir-western hemlock/evergreen huckleberry forest community, a special site, and has restored high quality freshwater wetlands and native plant species on the site.

24.4 - Interview(s) of involved people met

Department of Natural Resources:

Executive Management Division (EMD):

Clay Sprague	Deputy Supervisor of Uplands
Ben Hainline	WADNR Internal Auditor

Forest Resources and Conservation Division (FRCD) Staff:

Jed Herman	Division Manager
Jeff DeBell	Asst Division Manager-Silviculture Section
Bob Aulds	Silviculturist
Tami Miketa	Asst Division Manager-Ecosystem Services Section
Jon Tweedale	Asst Division Manager-Product Sales & Leasing
Allen Estep	Ecosystem Services Section, Program Lead, PSF / Certification
Lislie Sayers	Ecosystem Services Section, Program Implementation Lead, Forest Certification
Lee Stilson	Ecosystem Services Section, Archeologist

Pacific Cascade Region Staff:

Bob Johnson	Assistant Region Manager
Scott Sargent	Black Hills District Manager
Chris Rasor	Natural Resource Specialist (Intensive Management Coordinator)
Phil Wolff	Natural Resources Specialist (Recreation)
Derwood Duncan	Natural Resources Specialist (Forester – Compliance)
Jim Schindler	Natural Resources Specialist (Forester – Compliance)

South Puget Sound Region Staff:

Mark Thibo	Assistant Region Manager
Doug McClelland	Assistant Region Manager
Dave Lorence	State Lands District Manager
Dave Denis	Belfair Unit Forest Manager
Mike Davies	Hoodspout Unit Forest Manager
Ted Keeley	Elbe Unit Forest Manager
Alan Mainwaring	SPS Region Biologist



24.5 - Stakeholders identification and consultation

Twenty-one stakeholders were chosen from the list provided by Washington DNR. Emphasis was on stakeholders who did not participate in consultations in recent past audits. The stakeholders included entities from NGO's, Native Americans, lumber companies, and one FSC manager. Interviews with stakeholders included contacts made both by letter and by phone contact. Interviews focused on relationships with WADNR, communications with WADNR and any outstanding issues. Most stakeholders expressed satisfaction with WADNR. Two stakeholders commented on issues that required clarification. One comment was about the alternatives in the forest planning process and the second expressed concern about the recent staff reduction and how that may affect the WADNR's ability to meet beneficiaries needs in the future. Both of these were clarified and are documented.

24.6 - Other evaluation techniques

None Employed

24.7 - Total man days for the audit

The audit required seven on site man-days to be completed. Six man-days were spent auditing Washington DNR directly and included three man-days in the field auditing management activities. One day was spent consulting stakeholders.

24.8 - Changes since last audit

Over the past year there have been some significant changes at the Washington Department of Natural Resources. Significant staff reductions have occurred due to the poor economic conditions and budget reductions in all State programs. The management team responsible for forest certification has remained the same and it is expected that the certification program will remain effective as core staff continue to manage the program.

24.9 - Surveillance audit closing meeting

A closing meeting was conducted and past CAR's were reviewed. The one minor CAR that had been cleared on May 16, 2010 and was closed during this audit. The closing meeting was attended by WA DNR management and the findings were presented.

25 - Referential

25.1 - Forest management referential used for the initial audit



No changes have occurred to the Pacific Coast (USA) Regional Forest Stewardship Standard since the initial audit.

26 - Audit team observations

The audit team selected 24 sites to visit based on the range of silviculture and operations being carried out. WADNR staff put together all the pertinent information in excellent field packages. This is a tribute to the quantity and quality of information the WADNR uses to meet conformance to the Principles and Indicators.

Over the three days in the field, auditors examined harvest areas, planting sites, recreational areas, new road construction and maintenance projects, water management and RMZ protection and natural areas. Consistency was found throughout all the sites and implementation of planned activities was excellent. Harvest and regeneration activities were found to be effective in meeting reforestation and utilization expectations and the roads and water crossings were found to be in conformance with the criterion and indicators.

One minor corrective action was issued during the 2009 surveillance audit and it dealt with ensuring that shipping documents for FSC timber include the product group (FSC Pure) and the certificate number. The Lead auditor was provided with the evidence to clear this corrective action request and included sample shipping documents were provided for review and were found to be acceptable and was cleared on May 16, 2010. During this audit documents were reviewed and were found to be well implemented and the CAR was closed on November 2, 2010.

CAR #	CAR description	P&C indicator number	Action taken by the entity to close the CAR	Closed/ Open	Date of closure
08	Ensure that shipping documents for FSC timber include the product group (FSC Pure) and the certificate number	FSC-STD-40-004v2/6.1.2	Shipping documents (load tickets) for FSC timber sales and invoices have both the product group and certificate number identified	Closed	November 2, 2010

27 - Proposals regarding the certification decision

27.1 - Description of new recommendations

No recommendations are being put forth.

27.2 - New Minor Corrective Action Requests



No new minor Corrective Action Requests were issued.

27.3 - New Major Corrective Action Requests

No major Corrective Action Requests were issued.

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

It is the opinion of the audit team that the Washington Department of Natural Resources continues to meet the requirements of the FSC forest management standard for the Pacific Coast Region of the USA. All outstanding minor Corrective Action Requests have been addressed and closed. The certification of the Washington State Department of Natural Resources South Puget HCP Planning Unit should continue.

28 - Certification decision

After analysis of the conclusions of the audit team and after revision of the Corrective Action Request, the Wood and Forestry department decides to maintain the FSC Forest Management of the company.

Issued November 13, 2010; and finalized April 22nd April, 2011.

FSC Product Manager,

Héloïse D'HUART

Lead Auditor,

Vincent P. Corrao



E. Surveillance Audit 4

A fourth FSC forest management surveillance audit of the Washington Department of Natural Resources' (WA DNR) South Puget HCP Planning Unit was undertaken from October 4 to 7, 2011. The purpose of the audit was to verify WA DNR's FSC Program with the FSC-US Forest Management Standard (v1.0), check previous audit findings, monitor compliance with FSC Pacific Coast Region Appendices, and to consult with stakeholders. The scope of the audit has not changed as the WA DNR does not have significant changes in the ownership since the last surveillance audit.

29 - Base of evaluation

29.1 - Date of the surveillance evaluation

October 4 to 7, 2011

29.2 - Composition of the audit team

- Lead auditor:**
- Vincent Corrao, Certified Forester, RAB EMS Lead Auditor and FSC FM qualified Lead auditor on behalf of Bureau Veritas Certification. Mr. Corrao has expertise in forest policy, forest planning, Native American relations and forestry best management practices. He has been auditing forest management under a variety of standards for the past ten years.
- Auditor:**
- Robert Carlson, FSC FM qualified auditor on behalf of Bureau Veritas Certification. Mr. Carlson is trained as a logging engineer with extensive experience in transportation systems, harvest operations and silvicultural systems. He has been auditing under a variety of standards for 3 years.

29.3 - Forest management referential used for the surveillance audit

This surveillance was conducted under the FSC US-FM Standard V1.0. New changes were incorporated and verified using the Appendices of the Pacific Coast Region.

30 - Information collecting modalities

30.1 - Description of the audit program

The audit was carried out over four days. On October 4th the audit team spent the first day reviewing documents for Principles 6, 8, 9 and a sampling of other



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Principles and Criterion that had improvements or changes in the standard or in the WA DNR's operations. Additional issues relating to the operation of their certificate and the new requirements in chain-of-custody were discussed and have been implemented although the chain-of-custody changes are not required to be fully implemented until October 2012. One day was invested in contacting stakeholders with the focus on those organizations who had not recently provided input into the audit process. October 5th and 6th were spent in the field verifying documentation and operations along with reviewing additional documentation at headquarters. October 7th was spent reviewing additional documentation, follow-up on stakeholder input and performing the closing meeting. The audit schedule is provided below.

WADNR 2011 FSC Audit Schedule			
October 4, 2011			
PERSON	TIME	PLACE	ACTIVITY
Corrao, Carlson; Auditors	8:45 AM	Opening Meeting	Opening Meeting with Lislle Sayers, Allen Estep, Julie Sackett, Clay Sprague, Dave Gordon
Corrao, Carlson; Auditors	9:15 AM	WA DNR Office; Olympia WA	Document review; Principles 6, 8, 9 and interview with State Environmental Policy Act Services Program and Natural Areas Program
Corrao, Carlson; Auditors	4:45 PM	Review Field Agendas	Daily debrief, review field agendas
October 5, 2011			
PERSON	TIME	PLACE	ACTIVITY
Corrao; Auditor	8:00 AM	Capitol Forest; Sterling, Weald, Wee, Thunder Head, Fifty Fifty	VRH, variable thinning, planting, vegetation management, chemical application, old growth, bald protection, leave trees, compliance, surveying
Carlson; Auditor	8:00 AM	Tahuya Forest; Union Ridge, 3 Bears, Goodgully, Elfendahl Pass, Highark, Barbless	VRH, planting, vegetation management, recreation planning, community involvement, user group mitigation, riparian management, wetlands management, marbled murrelet protections, leave trees, road maintenance and abandonment plans, globally impaired species, compliance, surveying, land transactions, special forest products, western pond turtle protection, groundwater re-charge, firewood sales
Corrao; Auditor	1:30 PM	Capitol Forest; Fifty Fifty	Daily debrief and depart
Corrao; Auditor	2:00 PM	WADNR Office; Olympia, WA	Stakeholder Outreach and document review; Principle 6
Carlson; Auditor	4:15 PM	WADNR Work Center: Belfair	Daily debrief and depart
October 6, 2011			
PERSON	TIME	PLACE	ACTIVITY
Corrao; Auditor	8:00 AM	Tahoma Forest; Three Donkey Pole, Sun Beam PC, Harrington Rocks	VRH, active harvesting, retention, planting, vegetation management, road maintenance and abandonment plans, visual aesthetics, riparian management, wetlands management, compliance,
Carlson; Auditor	8:00 AM	Elbe Hills; Pickle topnotch, Crestview, Busybee, Middle Plum	VRH, variable density thinning, planting, northern spotted owl protections, marbled murrelet habitat, wetland management, riparian



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			management, legacy features, land transactions, natural areas program, community involvement, Mt. Rainier Gateway Initiative, leave tree configuration, blowdown, forest biomass, free-to-grow
Corrao, Carlson; Auditors	2:00 PM	Fire Hall; Elbe	Daily debrief and depart
Corrao, Carlson; Auditors	3:30 PM	WADNR Office; Olympia WA	Document review; Principles 5, 6
October 7, 2011			
PERSON	TIME	PLACE	ACTIVITY
Corrao, Carlson; Auditors	7:30 AM	WADNR Office; Olympia WA	Document review; chain-of-custody, Principles 1, 5, 8
Corrao, Carlson; Auditors	11:00 AM	WADNR Office; Olympia WA	Closing Meeting with Lislle Sayers, Allen Estep, Clay Sprague, Dave Lorence

30.2 - Total man days for the audit

The audit required seven on site person-days to be completed. Seven person-days were spent auditing Washington DNR directly and included four person-days in the field auditing management activities, two days on document review and one day was spent consulting stakeholders.

30.3 - On-site visit(s)

During the audit, the auditors conducted two days in document review at the headquarters office in Olympia Washington and one day was conducted contacting stakeholders who had been sent a consultation letter 5 weeks prior to the audit. Four field days were spent auditing 29 Stand ID forested field sites as listed below.

The WA DNR has the South Puget Sound and a small portion of the Pacific Cascade Region under the FSC scope. Each stand is identified by the Washington DNR as an FMU with specific Stand ID numbers as indicated on the table below. There is only one FMU in the scope of this audit.

WADNR 2011 FSC Audit Sites Visited					
Site	Stand ID #	Stand ID Name	Unit Acres	Unit Ha .4046/1	Notes
1	24303	Sterling U1	58	23	2010 VRH, leave trees, compliance, site prep, chemical mitigation for aerial application



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WADNR 2011 FSC Audit Sites Visited

2	36662	Thunder Head U1	88	36	2005 VRH, site prep, survival and vegetation management survey, legacy tree protection, deer browsing, cedar tree establishment, vegetation management, riparian management, ground and aerial application
3	60887	Weald U4	89	36	2009 VRH, site prep, planting, old growth, survival survey, bald protection, ground application
4	71701	Wee U1B	4	2	2010 VRH, site prep, pipe replacement, wetland management zone, pileated woodpecker snag, planting, survival survey, ground application
5	71871	Fifty Fifty U5	15	6	2010 VRH, planting, survival survey, interplant mortality survival, vegetation competition survey
6	25310 added	Busybee VRH U3 ACTIVE	36	15	2011 variable thin, contract harvest, compliance
7	43491 added	Busybee VRH U4 ACTIVE	49	20	2011 variable thin, contract harvest, compliance
8	43720	Pickle U1	41	17	2010 VDT (variable density thinning), northern spotted owl habitat, marbled murrelet habitat, wetland management, riparian management, legacy features
9	70711	Pickle U3	6	2	2010 VDT (variable density thinning), northern spotted owl protections, marbled murrelet habitat, wetland management, riparian management, legacy features
10	60738	Middle Plum	71	29	land transactions, natural areas program, community involvement, Mt. Rainier Gateway Initiative
11	19542	Giddy Up U2 VRH	30	12	2010 VRH, planting, northern spotted owl habitat, wetland management, riparian management, recreation
12	15546	Crestview U2	72	29	2003 pole, 2010 VRH, planting, leave tree configuration, blowdown, forest biomass
13	20060	Topnotch 1	71	29	2000 VRH, planting, survival, vegetation competition and stocking surveys, vegetation management, creating and maintaining northern spotted owl habitat, legacy features, blowdown, free-to-grow
14	65176	TDP VRH U1 (Three Donkey Pull)	19	8	2010-2011 VRH, vegetation management, compliance
15	75712	TDP VRH ACTIVE U3 (Three Donkey)	52	21	2010-2011 VRH, leave trees, compliance



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WADNR 2011 FSC Audit Sites Visited

		Pull)			
16	46071	Sun Beam PC U1	71	29	2009-2011 VRH, planting, survival survey, road maintenance and abandonment plans, visual aesthetics, retention
17	46419	Harrington Rocks ACTIVE U1	48	19	2010-2011 VRH, riparian management, wetlands management, compliance
18	65288	Harrington Rocks ACTIVE U2	23	9	2010-2011 VRH, riparian management, wetlands management, compliance
19	65289	Harrington Rocks U3	11	4	2010-2011 VRH, riparian management, wetlands management, compliance
20	n/a	Elfendahl Staging area or at Green Mtn Horse Camp		0	Recreation planning, land transactions, special forest products, western pond turtle protection
21	41277	Goodgully U1	41	17	2011 VRH, groundwater re-charge, compliance
22	41279	Goodgully U2	55	22	2011 VRH, firewood sales, compliance
23	41297	3 Bears U2	56	23	2011 VRH, compliance, biological legacies retention
24	73083	3 Bears U3	60	24	2011 VRH, riparian management, wetlands management, marbled murrelet mitigation, compliance
25	75703	Barbless U5	66	27	2011 VRH, leave trees, protection of G1/G2 species
26	41282	Highark U1	49	20	2010 VRH, planting, compliance and survival survey, recreation, community involvement and user group mitigation
27	41284	Highark U2	45	18	2010 VRH, planting, survival survey, recreation, community involvement and user group mitigation, road maintenance and abandonment plans, riparian management, wetlands management
28	75143	Highmark U3	4	2	2010 VRH, planting, survival survey, recreation, community involvement and user group mitigation, road maintenance and abandonment plans, riparian management, wetlands management



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WADNR 2011 FSC Audit Sites Visited					
29	19021	Union Ridge	96	39	2004 VRH, planting, survival and stocking surveys, vegetation management, free-to-grow
29 Forest Stands were site visited			1326 acres	538 hectares	

The selection of field sites was based upon a desire to assess all phases of forest management on WA DNR operations. Therefore, sites were chosen which represented typical forest management harvests under all the predominant silvicultural systems being used. The primary silvicultural prescription is Variable Retention Harvesting (VRH) which is a combination of regeneration harvest with retention of legacy trees, green tree retention and wildlife structure which includes large and small snags and large woody debris left on the sites. Sites were chosen based upon the type and methods of harvest employed and the site visits included a wide range of activities. Treatments included forest planting, herbicide application, road maintenance and abandonment, stream crossings and old growth protection. Old growth retention was seen in the natural areas and in the riparian management zones (RMZ) and wetland areas observed during the site visits. The auditors also selected a number of fish passage restoration, maintenance and bridge projects observed on 7 active timber sale sites.

The WA DNR has an extensive tracking and documentation system to track all activities on all FMU sites. Site are selected based on environmental risk and are selected to cover as many activities as possible and to visit as many sites as time permits. Units are selected each audit to visit forested sites that have not been selected in the past.

All harvest areas were inspected and it was verified that the condition of the roads were well managed with little soil disturbance or impacts to water quality. The WA DNR has legal requirements to achieve desired fish habitat and water quality by constructing and maintaining roads in a manner that will not result in the delivery of sediment and surface water to any typed water that would preclude this objective. All activities implemented were assessed as to whether they were conducted as required by the Washington Forest Practices Act and the Habitat Conservation Plan and the policies and procedures of the South Puget HCP Planning Unit Forest Land Plan. The post harvest monitoring was also assessed to ensure that the post harvest activities were being implemented successfully and in conformance with requirements.

All field site areas examined were found to be in conformance and met the forest management standards of the region. The planted sites were found to be growing well and a combination of western red cedar, alder, western white pine, Sitka spruce in addition to Douglas fir were being planted to increase biodiversity where possible. The WA DNR is aggressively evaluating planting western red cedar where it can be successfully established. Western red cedar is browsed heavily in the region and an effort to plant and keep this species in historic numbers is declining outside of WA DNR lands. The WA DNR has continued to diligently re-establish western red cedar in the landscape.



The site visits included four herbicide units. The WA DNR does not use any highly hazardous pesticides as identified in FSC's Pesticide Policy and Guidance on Implementation. The WA DNR minimizes herbicide use throughout

Of the 499 total acres treated with herbicide, the acreage that was treated with various herbicide mixes

(All herbicide use was within Pacific Cascade Region; South Puget Sound Region did not use any herbicide)

Note : South Puget HCP Planning Unit consists of acres within both Pacific Cascade Region and South Puget Sound Region.

HERBICIDE MIX	ACRES
ACCORD + ARSENAL + OUST	126
ACCORD + CHOPPER + OUST	195
ACCORD + ESCORT	59
GARLON ULTRA	50
GARLON ULTRA + GARLON XRT	24
GARLON XRT	10
TRANSLINE	35
Grand Total	499

the South Puget HCP Planning Unit. Field observations verified that most units are not chemically treated. The table below identifies the herbicide mixes and acres applied and it identifies that the South Puget HCP Planning Unit manages with minimal chemical use.

The 499 acres listed below consist of both site preparation and vegetation management acres and are also a combination of ground application and aerial. Of the 1, 453 acres available for planting in FY11, 17% were chemically treated for site preparation and an average of 21% were chemically treated for vegetation management. Ground herbicide application was conducted on 411 of these acres (82%). The remaining 88 acres were applied aurally.

The site preparation units which are herbicide treated include 254 acres and is 17 percent of the total area that were available for planting in FY11. In vegetation management, 245 acres are treated annually and this is 21% percent of the 10 year mean annual planting acres.

In summary, WA DNR does not apply chemical on an average of approximately 81 percent of the managed acres each year and the majority of the application is conducted by hand ground application. These practices effectively minimize chemical use.

30.4 - Documents review

The WA DNR has extensive documentation on the processes implemented in the management of the resources. The comprehensive list of all documents used by the WA DNR can be found in Appendix E. The document list provided below in this report was used to verify the WA DNR's conformance to the FSC FM V1.0 Standard.

WA DNR FSC 2011 Documents Reviewed
South Puget Forest Land Plan; DNR



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WA DNR FSC 2011 Documents Reviewed

- FEIS: South Puget HCP Planning Unit Forest Land Plan FEIS (January 2010)
- DEIS: South Puget HCP Planning Unit Forest Land Plan DEIS (July 2008)
- Report: A Summary of the Current Forest Management Strategies for the South Puget HCP Planning Unit (November 2008) *created to meet FSC requirements*
- Non-Project Review Form (June 2005)
- SP FLP input/output matrix/ working paper An examination of the Economic Contribution of the Alternatives under consideration in the WADNR SPFLP (Sept 2009)(Rural Technology Initiative Working Paper 9 (Jobs, Revenues, and Taxes from Timber Harvest; An Examination of the Forest Industry Contribution to the Washington State Economy (Sept 2007)
- Letter: NSO Habitat Definition Changes in DNR's SP HCP Planning Unit WEC vs. Sutherland Settlement Agreement Approval) (March 2010)

Timber Sale Contract Clause and Administration Manual; DNR (March 2011)

Annual Report; DNR 2010

FSC US Appendix A. Relevant Laws, Treaties, and Agreements; FSC-US (Jan 2010)

RCW 41.80 - Collective Bargaining; *Freedom of association and the effective recognition of the right to collective bargaining.*

RCW 9A.40.100 - Trafficking and WAC 296 – Department of Labor and Industries; *The elimination of all forms of forced or compulsory labor*

RCW 49.12.121 – Wages and Working Conditions of Minors and WAC296.128.400 - minors; *the effective abolition of child labor.*

RCW 49.60 - Discrimination Human Rights Commission and DNR Policy PO-01-001 - Equal Opportunity/Non-discrimination; *The elimination of discrimination in respect of employment and occupation.*

Forest Practices Enforcement Actions (all) SPS Region; DNR (report date: 9.22.11)

Law Enforcement Policies; DNR

Policy	PO22-001	Law Enforcement	7/27/2010
Policy	PO22-002	Law Enforcement, Warden/Police Powers	5/5/2004
Policy	PO22-003	Law Enforcement, Natural Resource Investigations	7/27/2010

Special Forest Products; DNR (Sept 2011)

- Plan: 2008-2016
- Maps: Tahuya, Green Mountain, Hood Canal
- Brush Lease Example:

Scale Sale: Contract, Invoice (NatureE), Scaling Bureau Report, Completed Load Ticket; DNR

Contract Harvest Sale: Contract, Invoice (NatureE (finance)), Log Sales CT3 System & load listing report (Scale System), Scaling Bureau Report, Completed Load Ticket

Lump Sum Sale: Contract, Invoice, Call-Log

HCP (Habitat Conservation Plan); DNR

- Website Overview (September 2011)
- Final Habitat Conservation Plan (September 1997)
- Draft Habitat Conservation Plan (March 1996)
- DEIS for the HCP (March 1996)
- FEIS for the HCP (October 1996)
- Incidental Take Permit
- Biological Opinion

SEPA (State Environmental Protection Act) Services; DNR (March 2009)

- DNR SEPA Handbook
- SEPA Checklist Resources Guide
- Responding to Comments Guidance
- Timber Sales Checklist History
- Frequently Asked Questions
- Website (Sept 2011)

Western Washington Forest Practices Application/Notification; DNR (September 2009)



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WA DNR FSC 2011 Documents Reviewed

Forestry Handbook Procedures; DNR

Washington State Forest Practices Rules; 2002 (updated 6/8/2009)

South Puget Sound HCP Planning Unit Prescription Summaries, Activities, Activity Objectives and Completed Comments for FMUs that had any Silvicultural Activity, other than Surveys, Completed; DNR

FPARS (Forest Practices Public Review System) Application to view the Review System and Website (September 2011)

Sustainable Harvest Calculation - Westside website (September 2011)

Natural Heritage Program Info:

- Website: Washington Natural Heritage Program (Oct 2010)
- Website: Natural Heritage Advisory Council (Oct 2010)
- Website: Natural Heritage; Conservation Partners (Oct 2010)
- Website: Natural Heritage Projects (Oct 2010) *projects not printed*
- Website: Natural Heritage Products & Services (Oct 2010)
- Document: Natural Heritage Washington Herp Atlas (June 2009)
- Website: Natural Heritage Reference Desk – Available Information
Example :Natural Heritage Reference Desk Rare Plants Information
Example Natural Heritage Reference Desk Ecological Communities Information
Example Natural Heritage Reference Desk Rare Animals Information
Example Natural Heritage Reference Desk GIS data
Example Natural Heritage Reference Desk Publications
- Field Guide: Draft Field Guide to Ecological Systems (February 2008)

Natural Heritage Plan; DNR (2007) and update (2011)

NatureServe Website (Oct 2010)

Explorer Website (October 2010)

LandScope Website (October 2010)

DNR's Natural Areas Program Information Website; DNR (October 2010)

- Natural Area Preserves locations (October 2010)
- Natural Resource Conservation Areas locations (October 2010)

Forest Practices Activity Map (Sterling U1 Timber Sale - Capitol); DNR (August 2009)

Forest Practices Activity Map (Barbless U5 - Tahuya); DNR (April 2011)

Recreation Planning: Green Mountain / Tahuya Forest

- Website: Planning for Recreation in Green Mountain and Tahuya State Forests (Sept 2011)
- Planning Committee
 - List of Meeting dates
 - Agenda Example (July 2011)
 - Notes Example (July 2011)
- Fact Sheet: Planning for the future for recreation in Green Mountain and Tahuya State Forest (Oct 2010)
- Green Mountain and Tahuya State Forest Open house comments (Oct 2010)
- Map: Map of the Area Green Mountain and Tahuya State Forest (Jan 2011)
- Environmental Assessment: Recreation Land Suitability (Sept 2008 – draft)
- Environmental Assessment: Recreation Land Suitability (March 2011)
- Environmental Assessment: Management Module (March 2011)

Policy for Sustainable Forests (PSF); DNR (December 2006)

PSF Draft EIS; DNR (April 2005)

PSF Final EIS; DNR (June 2006)

Draft Old Growth GIS Layer (Oct 2010)

- Description of the Proposed Layer
- GIS Tracking Workflow
- GIS Editing Procedure



WA DNR FSC 2011 Documents Reviewed

- Old Growth Assessment Document Guidelines

Old Growth packet; DNR

- Definition and Inventory of Old Growth Forests on DNR-Managed State Lands, June 2005
- Extent and Distribution of Old Forest conditions on DNR-Managed State Trust Lands in Eastern Washington, December 2007
- The Case for Active Management of Dry Forest Types in Eastern Washington: Perpetuating and Creating Old Forest Structures and Functions, September 2008
- Policy: PO17-008 Old Growth Stands in Western Washington
- Policy: PO14-019 General Silvicultural Strategy
- Procedure PR 14-004-045 Old Growth Timber Harvest Deferral and Protection (Westside)
- Procedure: PR 14-006-091 Retention and Perpetuation of Legacy Trees, Snags and Downed Wood (Eastside) (May 2011)
- SharePoint site for Westside Old-growth, DNR (Oct 2010)
- Westside old growth assessment package: includes assessment description, decision pathway, assessment form, secondary screening information, DNR (Oct 2010)
- Report: Acres of Potential Old Growth and Older Forests in South Puget Sound HCP Planning Unit w/WOGHI attribute definitions, DNR (May 2007)
- Westside Old Growth FAQs, DNR (no date)

RFRS: Forest Restoration Strategy; DNR (April 2006)

- a. Strategy: Habitat Conservation Plan Riparian Forest Restoration Strategy (RFRS) (April 2006)
- b. Approval Letter: USFWS and NOAA (August 2004)
- c. HCP Addendum: SEPA Notification and Addendum to the draft/final HCP EIS for the RFRS (April 2006)

Developing Westside Silvicultural Prescriptions An Inter-Active Self-Study and Reference Pamphlet; DNR (March 2007)

Webster Nursery Program Info; DNR May 2008

Seed Orchard Program Info, DNR (Nov 2009)

Seed Zone Info; DNR

- a. Manual (2002)
- b. Website **WASHINGTON TREE SEED TRANSFER ZONES**

Variable Retention Harvest (VRH) related to FSC:

- *PSF Policy: PO14-010 WATERSHED SYSTEMS (July 2006)*
- *Forestry Handbook Procedure PR 14-005-050 Maximum Size for Even-Aged Final Harvest Units (Dec 2009)*
- *Letter: DNR letter to Bureau Veritas (March 19, 2008)*
- *Data: Average Acre Size – presented 2010 w/ list of sales & compared years*
- *Data: Average Acre Size – presented 2011 w/ list of sales & compared years*
- *Publication: conserving Forest Biodiversity – A Comprehensive Multi-scaled Approach (Jerry F. Franklin's Scientific Data on Clear-cut Acre Size)*
- *Data: Harvest Deferral (FY11) Report: FSC 6.3.e.5 (FSC Pacific Coast) Pre-harvest basal area retention; 30%*
- *Data: Harvest Deferral (FY12) Report: FSC 6.3.g.1 (FSC US) Pre-harvest basal area retention: 33.7%*

Regeneration Harvest Unit Stand Age and Adjacent Stand Age (Used for Culmination of Mean Annual Increment (CMAI) and Adjacency-Greenup) Report; DNR FY11 & FY 12 Table / Maps

Noxious Weeds Info; DNR

- RCW 17.10 Noxious Weeds Control Boards
RCW 17.10.007 Purpose – Construction
RCW 17.10.010 Definitions
RCW 17.10.145 State Agencies duty to control spread of noxious weeds
- DNR Procedure PR 14-006-050 Controlling Invasive Plants and Noxious Weeds (2007)
- WA State Noxious Weed Board Info (About Us, Role, Laws, Noxious Weed List)



WA DNR FSC 2011 Documents Reviewed

- Website Example: King County Noxious Weed Project

Wildfire Reduction Contract Info; DNR

- Website: How do I participate in upcoming Fuel Reduction Bidding (10.2.11)
- Website: Wildfire Fuels Reduction Contracts – Invitations to Bid (10.2.11)
- Website: Wildfire Fuel Reduction - Awarded Contracts (10.11.11)
- Contract: Wildfire Fuels Reduction Contract, Invitation to Bid – Greenwater Project, DNR (Nov 2010) w/ amendment

Forest Roads Guide (manual); DNR 2011

Forest Practices Compliance Program Info; DNR

- Forest Practices Compliance Monitoring Program Objectives (May 2010)
- WAC 222-08 Practices & Procedures
- Report: TFW (Timber Fish & Wildlife) Implementation Committee (recommendations for sampling, field protocols, limitations and damage control) (Nov 1991)
- Manual: DNR's Compliance Monitoring Description (Jan 2010)
- Manual: DNR's Compliance Monitoring Protocols (March 2010)

SLIPS (shallow landslide initiation point screen) Geological Society of America Abstract Presentation (October 2009)

Road Plan Example; DNR

Guidance for Mitigation of Road Stream Crossings outlined in the Riparian Forest Restoration Strategy (RFRS) from Engineering Division; DNR (May 2011)

Grazing Lease Packet; DNR

- Lease template, example and list
- Brochure: Ag and Grazing on WA Trust Lands
- Brochure: How to Lease WA State Trust lands for Ag or grazing,
- Policy Plan: Agricultural and Grazing Lands Program Policy Plan 1988 (*reprinted in 1993*)
- Ag Policies

Report: Summary of Activities for SP HCP Planning Unit; DNR

- FY11
- FY10
- 10 year roll-up (also has PCT)
- Email verification that DNR didn't use any chemicals on the highly hazardous list in FY11 (9.22.11)

WA State Pesticide Laws

- WSDA Pesticide Laws and Other Related Regulations (Nov 2010)
- WA Dept of Agriculture Commercial Pesticide License List (Sept 2011)
- WA Dept of Agriculture Individual Pesticide License List (Sept 2011)

WA Contract Loggers Association (WCLA) Master Loggers Program

- Website: WSLA master loggers 3.18.11
- Email: to staff re: posting WCLA Master Loggers List to TSDC 4.27.11
- Email: to staff relaying trained loggers 4.27.11
- List: Mater Loggers 4.18.11

RCW 79.17.210 Real Property Asset Based – Natural Resources Real Property Replacement Account

RCW 79.19.010 Legislative Finding – Land Bank

Final Report to the Legislature: Retention of High-Valued Forest Lands at Risk of Conversion to Non-Forest Uses in Washington State (March 2009)

Report: The Goldmark Agenda – Strategic Plan 2010-2014 (April 2010)

- Email / Press Release: Commissioner announcement of release (April 2010)
- Email: Direction from Leonard Young, Department Supervisor w/examples from Aquatics Division and Olympic Region (April 2010)
- Example: Concept Paper: OESF contribution to meeting DNR's strategic Plan (January 2010)
- Example: GIS Softcopy Photogrammetry 3-D GIS systems (May 2010)
- Update to Executive Management: Goal 1. Deliver on Our Promise to Manage State Lands Sustainably (Detail and Summary)
- The Goldmark Agenda Strategic Plan Milestones and Performance Measures (7.18.11)



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WA DNR FSC 2011 Documents Reviewed

<p>Community Forest Trust Bill; HB1421</p> <ul style="list-style-type: none"> a. DNR Press Release: Community Forest Trust bill signed into law by Governor Gregoire (4.29.2011) b. Session Law – HB 1421 c. DNR’s Fact Sheet d. Asset Management’s bill analysis
<p>Management Review – FRCD re-structure addressing monitoring</p> <ul style="list-style-type: none"> a. Current Organizational Structure and Proposed Change (printed 10.3.11) b. Forest Resource and Conservation Priorities and Organizational Structure (printed 10.3.11)
<p>DNR’s Forest Practices Division Compliance Monitoring Report 2008-2009 (January 2011)</p>
<p>DNR’s State Lands Effectiveness Monitoring: (DNR’s HCP)</p> <ul style="list-style-type: none"> • Website: Enhancing Spotted Owl Habitat Through Variable Density Thinning • Report: Spotted Owl and Barred Owl Resource selection in Southwestern WA, Progress Report WDFW? (Feb 2010) • Website: Monitoring of In-stream Habitat Conditions and Trends • Website: Studying Riparian Silviculture Treatment Alternatives • Website/ Report: Effectiveness Monitoring of Water Quality Mill Creek and Abernathy Creek sub-basins Columbia HCP Planning Unit (November 2004) • Report: Washington State Lands HCP Effectiveness Monitoring Northern Spotted Owl Silviculture (December, 2001)
<p>DNR’s State Lands Implementation Monitoring: (DNR’s HCP)</p> <ul style="list-style-type: none"> • Website: Implementation Monitoring (April 2011) • Unstable Slopes Pilot Project for State Lands, DNR (Sept 2003) • 2002 Implementation Monitoring Report, DNR (Feb 2003) • 2003 Implementation Monitoring Report, DNR (March 2004) • 2004 Implementation Monitoring Report, DNR (Feb 2005) • 2005 Implementation Monitoring Report, DNR (Feb 2007) • 2006 Implementation Monitoring Report, DNR (Oct 2007) • 2007 Implementation Monitoring Report, DNR (July 2008) • 2008 Implementation Monitoring Report, DNR (Dec 2009) • 2009 Implementation Monitoring Report , email (April 2011)
<p>FRIS: Forest Resources Inventory System:</p> <ul style="list-style-type: none"> • Field Procedures: Natural Resources Field Procedures Forest Resource Inventory System (FRIS), (June 2002) • Refresh Process: DNR FRIS Refresh Process Document (June 2009) • Dictionary: FRIS2 Data Dictionary, DNR (June 2009) • Update: FRIS Update Summary v1.1 (January 2010) • Refresh: FRIS Refresh notice (March 2010) • Status Report: FRIS Status Report - Comparison of the 2006 and 2010 FRIS Updates for DNR Trust Lands (August 2010) • Summary: How to use Lidar to inventory forest stands (Dec 2008)
<p>Report: Tree Blowdown Aerial Survey, WA Coast, DNR (March 2008)</p>
<p>January 2009 Storm:</p> <ul style="list-style-type: none"> a. Summary Report: Landslides, State Trust Lands, and the January 2009 Storm in Whatcom County; DNR Statelands (Oct 2009) b. Jeff Grizzel’s presentation to Whatcom County related to the above report; DNR (Oct 2009) c. Geological Field Reconnaissance: Racehorse Creek Landslide and The Lower Reaches of Racehorse Creek Final Report d. Reconnaissance study of landslides related to the January 2009 storm in the Acme Watershed; DNR Forest Practices (Jan 2010)
<p>Management Review – Effects of 2007 storm on</p> <ul style="list-style-type: none"> a. HCP strategies, for 2008 HCP Annual Meeting b. Storm recovery PC Region – presented to BNR March 2008
<p>Report: South Puget HCP Planning Unit SOLD (FSC) sales and Westside REMOVALS compared to the SHC for FY 2005-2011</p>



WA DNR FSC 2011 Documents Reviewed

Special Forest Products; DNR a. Plan: 2008-2016 (Sept 2011) b. Maps: Tahuya, Green Mountain, Hood Canal (Sept 2011) c. Brush Lease Example
Average annual cut / annual growth for south Puget (growth / yield)
MetaData: DNR GIS layers Subject list (Oct 2010)
Report: Northern Spotted Owl Surveys on DNR-Managed Lands in Southwest Washington; DNR (December 2007)
RMAPS: South Puget Sound RMAP Introduction a. Tahuya (map/table) 2011 b. Elbe (map/table) 2011 c. Tahoma (map/table) 2011
WA State Governor's Executive Order 05-05
2010 Annual Report; DNR
Corrective Action Plan for Non-conformance example; DNR (December 2010)

30.5 - Stakeholders identification and consultation

Eight stakeholders were chosen from the list provided by WA DNR. Emphasis was on stakeholders who did not participate in consultations in recent past audits. The stakeholders included entities from the Forest Service, statutory bodies, NGO's, Native Americans, contractors, beneficiaries and FSC National Initiative contact. Interviews with stakeholders included contacts made both by letter and by phone. Interviews focused on relationships with WA DNR, communications with WA DNR and any outstanding issues. All stakeholders during this consultation expressed satisfaction with WA DNR. The WA DNR works closely with a wide range of stakeholders through the State Environmental Protection Act (SEPA) public comment process and the Settlement Partners Representative Meeting which is held twice a year with this group and consists of NGO's, forest industry, and beneficiaries. Public comment is also received through the Board of Natural Resources. Those meeting are held once a month.

30.6 - Interview(s) of involved people met

Department of Natural Resources:

Forest Resources and Conservation Division (FRCD) Staff:

Julie Sackett	Division Manager
Clay Sprague	Asst Division Manager-Ecosystem Services
David Gordon	Acting Asst Division Manger-Product Sales
Pene Speaks	Asst Division Manager-Natural Areas / Natural Heritage
Allen Estep	Ecosystem Services Section, Program Lead, PSF / Certification
Lislie Sayers	Ecosystem Services Section, Forest Certification/Settlement Program Implementation Lead

Asset & Property Management Division Staff:



Rochelle Knust SEPA Services Section

Pacific Cascade Region Staff:

Bob Johnson	Assistant Region Manager – State Lands
Scott Sargent	Black Hills District Manager
Don Melton	Unit Forester – Capitol Forest
Jim Schindler	Compliance Forester – Black Hills District
Rob Hoff	Forester – Black Hills District
Leanne Krein	Intensive Management Forester – Black Hills District
Chris Rasor	Intensive Management Coordinator – PC Region

South Puget Sound Region Staff:

Art Tasker	Region Manager
Mark Thibo	Assistant Region Manager – State Lands
Doug McClelland	Assistant Region Manager – State Lands
Dave Lorence	State Lands District Manager
Dave Denis	Forest Manager – Belfair Unit
Ted Keeley	Forest Manager – Elbe Unit
Alan Mainwaring	Biologist – SPS Region

30.7 - Other evaluation techniques

None Employed

30.8 - FSC trademark use control

The use of the FSC trademark was reviewed for invoices, chain of custody and communications and was found to be in conformance with the FSC requirements.

30.9 - Controversial elements

There were no controversial elements identified during this surveillance audit.

30.10 - Changes since last audit

Over the past year changes within Top Management in WA DNR’s State Lands Programs occurred; individuals were reassigned to other positions with WA DNR. This change resulted in a period of time to transition for the organization. Budgets in the WA DNR have stabilized since last audit and have positively affected staff. The management team responsible for forest certification has remained the same and it is expected that the WA DNR’s Forest Certification Program will remain effective as core staff continue to manage the program.

30.11 - Surveillance audit closing meeting

A closing meeting was conducted and past findings were reviewed. The one minor CAR had been identified during this surveillance audit. The closing meeting was attended by WA DNR management and the findings were presented.



31 - Audit team observations

31.1 - Actions taken in order to answer to the Corrective Action Requests from the previous audit

No Corrective Action Requests were issued.

31.2 - Action taken in order to answer to previous observation

No Observations were issued.

31.3 - Evaluation of the general conformity level of the entity

The audit team selected 29 sites to visit based on the range of silviculture and operations being carried out. WA DNR staff compiled all pertinent information in excellent field packages. This is a tribute to the quantity and quality of information the WA DNR uses to meet conformance to the Principles, Criteria and Indicators outlined within the FSC-US Standard.

Over the four days in the field, auditors examined harvest areas, site preparation, planting sites, recreational areas, new road construction, fish passage structures, road maintenance projects, wetland protection, RMZ (riparian management zone) buffers and natural areas. Consistency was found throughout the field sites visited and implementation of planned site activities was excellent. Harvest and regeneration activities were found to be effective in meeting reforestation and utilization expectations and the roads and water crossings were found to be in conformance with the criterion and indicators.

The average opening size has declined and is in conformance with the stand 40 acres or less average. Large woody debris, legacy trees, old growth, snags and wildlife structure were found throughout all units visited on the field sites. Basal area on openings larger than 6 acres averaged 33 percent of pre-harvest basal area levels.

31.4 - Eventual changes in the scope of certification

There are no changes found during this audit in the scope of the WA DNR certificate.

32 - Proposals regarding the certification decision

32.1 - Description of new recommendations

No recommendations are being put forth.



32.2 - New Minor Corrective Action Requests

One minor corrective action request was made during the audit.

N°	Minor corrective action requested	Proposed date of implementation	Requirement number
09	The non-conformity 09 was identified as a requirement of the Habitat Conservation Plan which is to conduct monitoring. The annual implementation monitoring report for 2009 was not completed due to a change in staffing. The WA DNR is expected to address the staffing shortfall and to conduct the monitoring reports to meet the requirements of the HCP.	October 7, 2012	FSC-STD-FM (v1.0) 8.1a

Comments on the minor CAR:

The minor deals with the Habitat Conservation Plan (HCP) requirements of monitoring annually. The 2009 implementation monitoring report was not completed due to a temporary loss of staffing.

A minor CAR was issued due to the requirements of the HCP have been implemented on the ground satisfactorily and past monitoring reports have been completed on a timely basis.

32.3 - New Major Corrective Action Requests

No major Corrective Action Requests were issued.

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

It is the opinion of the audit team that the Washington Department of Natural Resources continues to meet the requirements of the FSC-US Forest Management Standard (v1.0) and Pacific Coast Region Appendices. The CAR 09 identified during this surveillance will remain open until next audit. The certification of the Washington State Department of Natural Resources South Puget HCP Planning Unit should continue.

33 - Certification decision

After analysis of the conclusions of the audit team and after review of the Corrective Action Request, the Wood and Forestry department of Bureau Veritas Certification decides to maintain the FSC certificate of the company.

Nevertheless the company shall implement the necessary actions to answer the minor CARs and to maintain the conformity to the FSC applicable standards.



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L.A.: Brian Callaghan/Vincent Corrao
Ref: PR080501US
Version: 5.1

Issued the February 13, 2012, reviewed the 15 November 2011, finalised the 28 of February 2012.

Issued FSC Product Manager,

Vincent Pelé

Lead Auditor,

Vincent P. Corrao



34 - Appendices

34.1 - Revision of pairs following initial audit

Note: The below referenced page numbers outlined by the peer reviewer reference a specific page within the report at the time of review. Since that time, the report has been reformatted. Therefore, the referenced page numbers listed below may not reflect accurate page numbers within this version of the report.

Washington Department of Natural Resources
South Puget Sound HCP Planning Unit
Forest Certification Systems – Initial audit

In conducting this review I read the entire document prepared by Brian Callaghan and provide comments below in the order in which they arose in the report. As my expertise and experience are primarily in the area of environmental protection and forest wildlife habitat, I focused my review on that section. Aside from several minor typographical errors and a need for clarity in a couple of places, I found the report to be well-written. Based on the report and its findings, it is clear that a thorough, comprehensive and rigorous audit of DNR's South Puget Sound planning unit was conducted.

Comments relative to the audit team's findings follow:

The report notes (p.9) that the allowable annual cut for the planning unit is 136,000 m³, then reports the 2006 harvest level to be 226,000 m³. Since a non-conformance was not issued, I assume this reflect FSC's consideration of timber harvest levels on a 10-year rolling average. I believe this is an effective approach which allows DNR to take advantage of favorable market conditions for the benefit of the trusts.

I concur with the team's assessment that principles 1, 2, and 3 are fully met as evidenced by no corrective action requests being issued. The cultural resources policy, coupled with formal agreements and regular communication is obviously resulting in good relationships with local tribes.

The minor non-conformances issued under principles 4 and 5 are consistent with the team's observations with regard to social impact assessment and maximization of stocking and growth within regeneration cuts of GEM forest zones, respectively.

Under Principle 6, I can only reinforce the team's positive observations relative to the Habitat Conservation Plan (HCP) which guides management on the South Puget, and other western Washington planning units. Implementation of the HCP ensures DNR's forest management activities are consistent with federal Endangered Species Act requirements for conserving threatened and endangered species.

SEPA review of all planned timber harvest units is also an effective means of minimizing environmental impacts, as noted in the report. I was a bit surprised with the observation related to T & E plants, resulting in a minor corrective action request, that the SEPA Guidance Handbook does not specify any review of rare plants and plant communities other than state listed T & E species. This seems inconsistent, since the DNR Natural Heritage Program enjoys an excellent reputation as the authority on rare plant species and plant communities in Washington State. A linkage between the NHP and the forest management



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organizations within DNR seems a potentially effective means of ensuring consideration of a broader range of plant species and communities within the required SEPA review. The Corrective action request relating to the SEPA guidance handbook seems appropriate relative to this issue.

Washington DNR's policy and program for retaining or creating stands with "older forest" characteristics is based on structural conditions rather than simply stand age. In this respect it allows for silvicultural intervention in some instances to more rapidly achieve the desired structural features (large trees, dead standing and down wood, multi-layered canopies and small openings) important to achieving functioning older forests. I concur with the audit report's acknowledgement that this approach is well-founded in ecological science and appropriate for protecting the biological and social values of old-growth forest on state trust lands.

As noted in the Audit, the SEPA guidance, the HCP, Forest practice rules, the Riparian Forest Restoration Strategy and Silvicultural Prescriptions collectively are effective vehicles for ensuring compliance with relevant laws and DNR policy, and for management of High Conservation Value forest on DNR managed state forest lands.

The audit noted that several harvest units exceeded the 40 acres specified in the FSC standards. It was also noted that the irregular shapes, presence of riparian buffers and leave tree patches reduced the effective size of several of these units. While issuing a non-conformance against this verifier, the report points out a number of benefits associated with harvest units larger than 40 acres. These include fewer roads, reduced habitat fragmentation, shorter disturbance periods during logging and avoidance of yarding effects on regeneration and buffers. While I understand the need for rigorously applying the standards, doing so in this instance seems like a contradiction with regard to environmental protection.

I concur with the audit team's issuance of 2 non-conformances related to the incomplete and as-yet unapproved through SEPA, management plan for the South Puget planning unit.

Consistency and continuity in monitoring and assessment, in my experience, are often very difficult to maintain. The audit findings indicate DNR is doing an exemplary job in this area, addressing all aspects of Principle 8. Evidence provided in the report fully substantiates this finding.

As noted above, maintenance of HCVF is being accomplished through several programs and policies, notably the HCP, Special Ecological features and General Silviculture strategies and linkage with WA Department of Fish and Wildlife and federal agency databases. Importantly HCVF maintenance is effectively occurring within the sideboards imposed by trust responsibilities and public expectations. I concur fully with the audit report's acknowledgement of the effectiveness of the DNR's approach to HCVF as evidenced by full conformance being noted for this principle.

Specific comments referenced by page number:

Page 5, and throughout the document – Unless the taxonomic designation has changed, Douglas-fir is hyphenated rather than being 2 words.

Page 5 – Pseudotsuga is misspelled.

Page 6 – Columbian white-tailed is correct name for this deer.



Page 7 - Salmonid is misspelled here and at other locations in the report

Page 8 – a) conifer is misspelled, b) is it to establish the “nest” or the “next” stand in the last paragraph?

Page 9 – the annual allowable cut is specified to be 136,000 m³, while the 2006 harvest was 226,000 m³, or significantly higher than the allowable cut. Is this a problem, or is it handled via the 10-year rolling average consideration? (also addressed above)

Page 10 – a level for the approximate annual harvesting rate is not provided.

Page 11 – paragraph 1- the description of how the initial allowable cut was established is unclear. Under 2 - legal, admin and land use context – state “forest”, rather than forested, trust land.

Page 12- top – it is unclear what “few tenure rights provided to the public” means.

Page 12 – 3.1 – land leases “provide”, is aggregate extraction gravel or mineral? Would one of these be a better term?

Page 14 - Estep title?, Herman needs to be capitalized, Vargas title?

Page 15 - should be Jed Herman, Bruce Mackey, Tami Miketa.

Page 16 – do the italics for Tahoma and Kitsap have any significance?

Page 17 – 5.5 drop “during the pre-audit and”, drop “s” in followings, Matt Longenbaugh

Page 18 – reconnaissance of all areas to **be** visited, audit team’s findings, as **well as from?** the extensive monitoring program.

Page 19 – 6.1.3 **however**, they do undertake cultural....., 6.1.4 **solicit** their help, ecosystems, **manage** the forest

Page 20 – period after cost-benefit analyses. Capitalize This. 6.1.5 – economic use **of** non-timber products.

Page 21 – Is it State of Washington **DNR?** both is misspelled in first paragraph. All individual harvest plans must (drop **are**), Indicate **Aleutian** Canada Goose

Page 21 – last paragraph which continues to p. 22 is awkward and unclear.

Page 22 – that **the** forester / engineer. **following** nonconformance. Does **Habitat Conservation Plan** need to be repeated here? **SPS? Coop and spp spell out?** but **they are** required. Last paragraph – Washington Forest Practices Act.

Page 23 – trees per hectares. (Douglas-fir) requires openings

Page 24 – seems like this discussion should be about **active** roads.

Page 25 – No site damage **was** observed. Last paragraph – **health situation?** of herbicide use.....does this mean **consequences** or is it a reference to the existence of Material Safety Data Sheets (MSDS) in DNR’s files?



Page 26 – forbs not **forbes**. What are habitat association **species**?

Page 27 – Paragraph 1 – in relations to. paragraph 2 – South Write out RTE species?
Not sure what the Forest Congress was and how it fits here – is it the NW Forest Plan?

Page 28 - 2nd paragraph – there **is** satisfaction with

Page 30 – 6.3.1 – all sales **are** tracked. 6.3.3 language not clear

Summary. The shortcomings noted as well as the positive comments on particular aspects of DNR's management were both appropriate and, in my view, justified and defensible. Based on my review of the audit report and my knowledge of Washington DNR's approach to forest management in the context of meeting their trust responsibilities, I concur with the audit team's recommendation for full and immediate certification with no conditions beyond the identified minor corrective action requests.



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34.2 - Responses to stakeholders

Date	Ref. remark	Remarks received	FSC criteria-indicator	Answer client	Answer Lead Auditor	Answer Bureau Veritas Certification
16-nov-09	1	No concerns. Satisfied with efforts of WDNR		None	None	
16-nov-09	2	No FSC Concerns - concerned over WADNR cuts		Cuts to civil service are part of constraints, performance being monitored through programs such as this.	Monitoring programme has been verified on field	
16-nov-09	3	No Concerns - public sector cuts is an issue		Cuts to civil service are part of constraints, performance being monitored through programs such as this.	Monitoring programme has been verified on field	
16-nov-09	4	Satisfied with the WDNR - more supply is needed		None	None	
16-nov-09	5	State has fair sales practices		None	None	
02-Nov-2010	6	No comments		None	None	
02-Nov-2010	7	No FSC concerns some questions on forest plan alternatives		WA DNR has evaluated the no harvest alternative and impact on T & E species	Auditor verified process has been implemented	
02-Nov-2010	8	One comment on reduction in workforce		The WA DNR has had a reduction in staff and is	Auditor verified that all policies and regulatory	



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Date	Ref. remark	Remarks received	FSC criteria-indicator	Answer client	Answer Lead Auditor	Answer Bureau Veritas Certification
		and meeting beneficiaries obligations		meeting all environmental and regulatory requirements	requirements are verified	
02-Nov-2010	9	Satisfied with WA DNR would like additional volume		None	None	
02-Nov-2010	10	No comments		None	None	