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

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PQC Code	E01E
Contract Number	18650854

Certification Audit:		Re-Certification Audit:	X	Surveillance Audit:		#	Scope extension audit:	
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Audit Summary

Introduction

This report documents the 2024 surveillance audit of Washington State Department of Natural Resources (DNR) forest management program to the requirements of the SFI® 2022 Forest Management Standard – Section 2. The audit was undertaken May 13th-16th, 2024.

The audit evaluated performance against the requirements in the SFI 2022 Forest Management Standard – Section 2. The South Puget Sound upland region is also certified to the FSC® Forest Management Standard.

The audit was led by Sarah Bros, R.P.F., a professional forester with over 40 years' experience working in the forest industry in Canada, including 10 years as an FSC/SFI Lead Auditor and accompanied by Julie Stangell, a professional forester with more than 30 years of field forestry experience working for large and small companies including 10 years as a Lead Auditor.

Audit Scope, Objectives, and Process

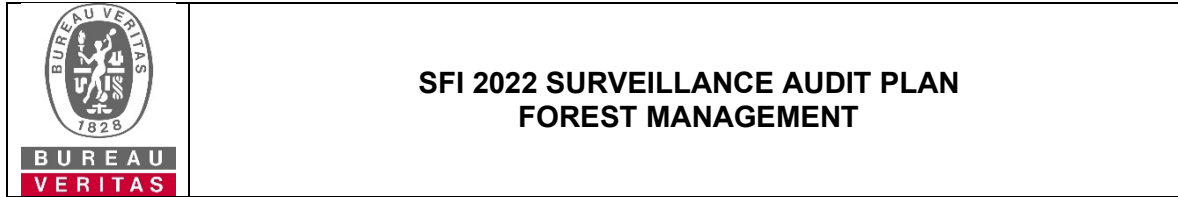
The scope of the surveillance audit is DNR's forest management program in the Pacific Cascade and South Puget Sound Regions. The objective of the audit is to verify Washington DNR's conformance to the requirements of the SFI® 2022 Forest Management Standard – Section 2. All objectives and performance measures were audited as part of the renewal audit as this is a multi-site audit.

The renewal audit was conducted against the SFI 2022 – Section 2 Standard and related normative documents and will follow ISO/IEC 17021:2015 management system protocols. Standard protocols and forms as found in the Bureau Veritas Certification SFI Auditor Handbook were applied throughout the verification. Prior to the audit, the auditor selected sites in both regions to be sampled based on management activities.

The opening meeting of the audit was held at the Washington Department of Natural Resources Forest Resources Division, Natural Resource Building (NRB) office in Olympia, WA on Monday, May 13th, at 8:30 am. Representatives from DNR attended the meeting in-person and virtually. The scope of the audit and logistics of the audit plan were discussed as well as the schedule for the audit. Field sites to be visited during the audit were confirmed. The closing meeting time and location was confirmed for May 16th, 2024 at 3:30 pm at the NRB.

Audit Plan

An audit plan was prepared and submitted to DNR in advance of the audit. One half-day with two auditors (equivalent to 1 person-day) was spent on document review and 3 days (two audit tours each day, equivalent to 7 person-days) were spent visiting field sites. A copy of the audit plan (see below) is retained on file at Bureau Veritas office in Houston, Texas.



Company	Washington State DNR		
Contract Number	18650854	Date:	March 22, 2024
Audit Type	Surveillance 1	Audit Dates:	May 13-16 th , 2024
Standards	SFI 2022, Section 2 Forest Management		
Audit Team:	Sarah Bros, R.P.F. (Lead), Julie Stangell (auditor)		
SFI/EMS Representative:	Tracy Petroske		
Opening Meeting:	Date:	May 13 th , 2024	
	Time:	8:30 pm	
	Place:	WaDNR head office, Olympia	
Closing Meeting:	Date:	May 16 th , 2024	
	Time:	15:30 pm	
	Place:	WaDNR – Mineral Work Centre, Enumclaw	
Audit Scope:	SFI FM: Forest Management in Washington State, multi-site		
Verification Indicators	SFI 2022 Objectives: All objectives		

Audit Objectives – SFI Certification shall establish:

Determine conformance of the organization’s SFI program against the SFI Forest Management Standard. Determine whether the organization’s SFI Program Management System and on-the-ground activities conform to the SFI standard.

Procedures and Protocols Used:

The audit will be conducted against the SFI 2022 Section 2 standard and related normative documents and will follow ISO/IEC 17021:2015 management system protocols. Standard protocols and forms as found in the Bureau Veritas Certification SFI Auditor Handbook will be applied throughout the verification.

*Audit schedule to be sent to client 14 days prior to the audit.
This schedule is flexible and adaptive so it can/may/will be altered as necessary.*

Audit Schedule

Date: Monday, May 13, 2024

Time	Activity	BVC Repr.	Company Repr.
8:30	Opening Meeting – Audit Objectives, potential findings, appeal procedures, nondisclosure, safety	Bros, Stangell	Petroske, Estep

9:00	Document review & interviews	Bros, Stangell	Petroske, Estep
16:00	Debrief – any initial findings and logistics for site visits	Bros, Stangell	Petroske, Estep
16:30	Depart site		

Date: Tuesday, May 14, 2024

Time	Activity	BVC Repr.	Company Repr.
08:00	Meet at the DNR office (Pacific Cascade Region)	Bros, Stangell	Petroske, Estep
08:15	Depart for field sites –	Bros, Stangell	Petroske, Estep
16:30	Return from field, debrief	Bros, Stangell	Petroske, Estep

Date: Wednesday, May 15, 2024

Time	Activity	BVC Repr.	Company Repr.
08:00	Meet at the DNR office (Pacific Cascade, South Puget Regions)	Bros, Stangell	Petroske, Estep
08:15	Depart for field sites –	Bros, Stangell	Petroske, Estep
16:30	Return from field, debrief	Bros, Stangell	Petroske, Estep

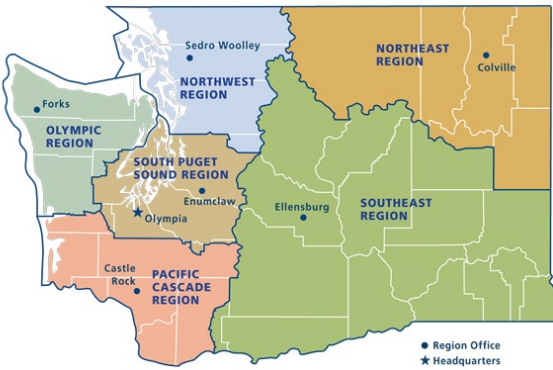
Date: Thursday, May 16, 2024

Time	Activity	BVC Repr.	Company Repr.
08:00	Meet at the DNR office (South Puget Sound Region)	Bros, Stangell	Petroske, Estep
08:15	Depart for field sites –	Bros, Stangell	Petroske, Estep
14:30	Return from field, auditors review findings	Bros, Stangell	Petroske, Estep
15:30	Closing meeting – review audit objectives, nondisclosure, present findings, appeal procedures, certification recommendations, audit date 2025	Bros, Stangell	Petroske, Estep
16:30	Depart site		

Documents to be reviewed:

- Forest management plan
- Reforestation plans and monitoring reports/assessments.
- Herbicide use (previous audit year or this year prior to audit)
- Pest management
- Consultation/communication/complaint logs with stakeholders, Indigenous peoples, and communities
- Forest management contracts (e.g., logging, planting, spray, survey)
- Policies and procedures (e.g., health & safety, SOPs)
- Science programs/research and community outreach
- Harvest records (average size of clearcut)
- Training records
- Management review

Upland Regions



Company Information

The Washington State Department of Natural Resources manages 5.6 million acres of forest, range, agricultural, aquatic, and commercial lands; 2.4 million acres are forested state trust lands or state forest lands. To manage this work effectively, DNR has 11 divisions, each focused on a specific business area, and 6 management regions (see map below), all located in the state of Washington. Per the DNR 2022 Annual Report, the forest lands generate more than \$381 million a year, much

of it to support public schools, state institutions, and county services.

Multi-Site Requirements

DNR is a multi-site organization headquartered in Olympia, WA where program policies and procedures are drafted and conformance is monitored and reported. In addition, there are six region offices which implement and manage upland forest activities as guided by DNR’s Policy for Sustainable Forests, the State Forest Practices Act, the State Environmental Policy Act, and other guiding policies and procedures. Other documents that guide forest management on the certified lands include the Trust Lands Habitat Conservation Plan, Forest Land Plans, and the Sustainable Harvest Calculations for the east and west sides of the Cascade Mountains.

For multi-site certifications, a site sampling method is generally used. The number of sites to be audited is equal to the square root of the number of sites x 0.8. Based on this sampling method, two of the six regions (sites; see below) are audited each year, on a three-year rotation. The surveillance audit plan for 2024 included field tours of the Pacific Cascade and South Puget Sound regions. Each region or site is audited on a three-year basis and these two regions were last audited in 2020. DNR is in conformance with all multi-site requirements.

Multi-Site	X	Group Certification
Sites		Sites Audited During this Event
Olympia, WA (Central Office)		X
Northeast Region		
Northwest Region		
Olympic Region		
Pacific-Cascade Region		X
Southeast Region		
South Puget Sound Region		X

Audit Results

Objective 1- Forest Management Planning: Management of DNR forested trust lands are guided by DNR’s Policy for Sustainable Forests, the Washington Forest Practices Act, the State Environmental Policy Act, and other guiding policies and procedures where applicable, such as the State Trust Lands Habitat Conservation Plan (HCP) and Sustainable Harvest Calculations.

These policies, regulations, and planning documents include objectives and/or consideration for habitat, RTE species management, water and wetland protection, forest conditions, riparian, roads, recreation, cultural values, fish, aesthetics, adaptive management, air quality, and carbon sequestration while recognizing DNR has a fiduciary duty to generate revenue from these lands. DNR-managed state trust lands provide revenue to support public institutions such as construction

of public K-12 schools and state universities. In addition, DNR-managed state forest lands provide funding services in many counties and contribute to the state General Fund.

The HCP is a multi-decade landscape-level plan specifically developed to protect habitat for at-risk species, such as the northern spotted owl and other plants and animals, while carrying out forest management and other revenue-producing activities.

Long-term sustainable harvest levels are required to be calculated every 10 years as per DNR policy PO-14-004. However, the last east side SHL was 1996-2006. Auditors could not find evidence that DNR had Board of Natural Resources approval to continue using the 1996 SHL for the interim. A **minor non-conformance** is issued, under Indicator 1.1.4, to correct this oversight. Both the eastern and western side of the Cascades are currently revising their sustainable harvest level (SHL) for 2025-2034. The Remote Sensing-Forest Resource Inventory System (RS-FRIS) is used in the calculation of the sustainable harvest level, is updated annually with forest inventory information, and is also updated at least every 2 years with forest change data (e.g., reforestation). Growth and yield data and analysis is updated prior to sustainable harvest calculations.

DNR maintains a database of all timber harvest activities and silvicultural activities, including seed orchards. The database, the Land Resource Manager (LRM), allows the user to query information for reporting or follow-up. The LRM also populates, and schedules future or follow-up work based on a "timer" field in the database. Timber sales documentation and regulatory compliance is stored electronically on DNR's intranet site, the Timber Sales Document Center (TSDC). This has become an effective tool for Contract Administrators while in the field. The TSDC tracks planned, sold, and completed timber sale documents since 2009. It also includes a forest management document library and functions as a central clearing house for all timber sale related documents.

DNR occasionally converts small areas for communication leases. These leases bring additional revenue to the trusts and comprise less than 1% of the certified forest.

Objective 2 - Forest Health and Productivity: DNR uses a variety of silvicultural systems to manage Trust lands. The systems used include Variable Retention Harvest (VRT), shelterwood, thinning, and even-aged harvest systems. All harvest areas are regenerated within 2 years of harvest completion. Per Washington Forest Practices Rules, reforestation of westside harvest area is required to have 190 trees per acre within 1 growing season. Currently, DNR plants at 300-400 trees/acre. Species planted include Douglas fir, Western Larch, Western White Pine, Spruce, Ponderosa Pine, Western Red Cedar and recently, Red Alder. Stock survival surveys are conducted the year after planting, and vegetation competition surveys are 2 years post-plant. When reforestation efforts do not meet the minimum stocking levels, the site is replanted. DNR has a procedure (GL 14-006-010) for surveying young stands that is aligned with the Forest Practices Act procedures for reforestation. Free to grow surveys are conducted at year 8 post plant. All survey results are recorded in the LRM, and the new information is updated in RS-FRIS.

DNR pesticide application records provide evidence that the applications were completed in compliance with label and legal requirements. No overspray or drift was observed.

Where herbicides are required to achieve management objectives, hand backpack spraying of site preparation and release herbicide mixes are used. DNR's policy is to use the minimum amount of chemical necessary to accomplish control objectives. The least toxic and lowest application rate required to control target species is used. Spray work is conducted by licensed contractors under the supervision of DNR foresters that are licensed applicators. All chemicals applied are registered and labeled for use in the State of Washington. DNR does not use chemicals on the WHO list of prohibited chemicals. All BMP's associated with chemical use were implemented in both regions audited. DNR implements IPM (Integrated Pest Management) strategies. Examples include hand-slashing in lieu of chemical application in select areas and hand-pulling of invasive weed species.

DNR has detailed soils maps that identify soil types and unstable soils and have procedures to minimize impacts to soils during harvest activities. Skid trails viewed during the audit were

consistent with direction to maintain soil productivity and health. DNR is required to leave 8 trees/acre for retention during harvesting. Observations during the audit found this requirement was met (see pic below).



DNR's Forest Resilience Division “works across all lands to ensure forested ecosystems retain their resilience against disturbance mechanisms such as fire, insects, and diseases. Forest Resilience also monitors Washington forests to see how they are adapting to climate change, increasing drought severity, and more severe heat waves.”

DNR manages 2 seed orchards and operates a nursery which supplies nearly all the trees planted on state forest trust lands. This supply is considered improved stock.

Objective 3 - Protection and Maintenance of Water Resources: Forest management activities in Washington state are subject to the state Forest Practices Act and associated rules including harvesting, roads, water protection and best management practices. The DNR Forestry Handbook outlines all procedures, processes, guidelines and supporting documents related to forest management activities. As an example, there are procedures for protecting water courses during harvesting or road building and rules around operating in wet weather on slopes. Timber sales and silviculture contracts include applicable procedures or processes from the Forestry Handbook including the use of best management practices (BMPs). Auditors observed adherence to BMPs but noted there is no requirement that fuel nozzles be secured in either contractor or DNR trucks. An **opportunity for improvement** is issued, under Indicator 3.2.2, to correct this minor oversight.

DNR has more than 14,000 miles of road on state lands and these roads are inspected regularly for issues and integrity/condition of road surface and water crossings. Most of these roads are permanent and most are open to the public. Some roads are gated where there are issues or where stakeholders have requested the road be closed to the public. Some roads get decommissioned under the road deactivation and abandonment mandate, when it has been determined the road is not needed for many years or where maintaining the road may be unstable in the long-term.

The auditors observed 2 examples of novel approaches to protecting the integrity of water resources: 1) cattle guard to divert runoff before it reaches stream, and 2) beaver bridge built on steep slope, above deactivated water crossing, to slow velocity of stream allowing for revegetation to establish successfully. A **notable practice** has been issued, under Indicator 3.2.1, to recognize both efforts to protect water resources.

Objective 4 - Conservation of Biological Diversity: The HCP provides the long-term strategy for protecting and enhancing rare, threatened, and endangered (RTE) species habitat. Specifically, DNR has conservation strategies for Marbled murrelet, northern spotted owl, and old growth forest. Other RTE species include northern goshawk, bald eagle, Taylor's checkerspot butterfly, and Quinault fawn-lily. The Forestry Handbook contains procedures and policies for the identification of RTE species habitat, and old growth characteristics.

The RS-FRIS contains data on forest cover based on LiDAR, and air photos supplemented with ground-based plot data. DNR uses this data to manage habitat types used by RTE species. DNR has set aside special management zones, removing these areas from timber sales to meet habitat objective strategies. All proposed timber harvests are reviewed by regional wildlife biologists prior to going up for auction. All foresters and/or contract administrators interviewed by the auditors were well versed in, for example, identification of old growth characteristics. Regional biologists will, when required or requested, assess timber sale areas for special habitat types.

DNR works actively to control the spread of invasive species through silvicultural practices and also through public education. DNR uses a combination of herbicides and manual hand pulling to control Scotch broom, one of the more common invasive species in the state.

Assessments in riparian areas are also conducted during the planning phase and results are used to update the GIS database with ecological significance and riparian features. DNR has a program to restore and enhance riparian reserves.

The Natural Areas Preserves and Natural Resource Conservation Areas protect “outstanding examples” of RTE species habitats and threatened native ecosystems. These areas provide educational and research opportunities for the public.

Objective 5 - Management of Visual Quality and Recreational: The Forestry Handbook has a Visual Impacts Policy and Visual Management Procedure that is used when stakeholder consultation has identified a concern. The requirements for visual aesthetics are included in the Timber sale contract in the placement of landings, harvest layout, and roads. DNR employs a variety of methods to achieve visual aesthetics including in-block retention patches or single tree retention, leave strips, variable block boundaries that enhance visual aesthetics.

The maximum harvest block size is 100 acres (40 ha) for even-aged forest management. This size limit can be exceeded for fire salvage or forest health concerns. There are no block size limits for shelterwood or thinning harvest prescriptions. One site (Nakia Creek Salvage Harvest) viewed in the audit was an example of a 2,000-acre wildfire that was salvage harvested.

DNR has a well-organized and diverse recreation program to satisfy the variety of outdoor enthusiasts. Currently, the recreation program manages 180 sites, including 80 campgrounds, and manages more than 1200 miles and 32,000 acres of designated recreation areas. DNR’s recreation managers and staff work with several recreation groups (e.g., ATV clubs) to maintain and assist with the construction of trails. DNR partners with programs such as youth corps to build new recreation trails. Auditors viewed both motorized ATC, dirt bike and 4X4 trails bike trails, and non-motorized mountain bike, horseback riding and hiking trails during the audit. DNR also manages primitive campsites on state trust forest lands. Many DNR roads and recreation trails are freely accessible, but some parking areas require the daily or annual purchase of a Discover Pass. Auditors noted DNR signage at recreational parking areas that explain the link between sustainable forest management, revenue for the community, and wildlife management. Many recreational trails provide opportunities for bird watchers as well.

Objective 6 - Protection of Special Sites: The Natural Heritage Program provides a link between science and conservation in the state. DNR recently launched a public GIS map information portal, Washington Natural Heritage Program Data Explorer, with the listing and location of rare species and ecosystems found in the state.

DNR is responsible for the consultation with local tribes and the protection of cultural values. The Department of Archaeology and Historic Preservation (DAHP) is the state regulatory agency to guarantee those consultations and protections occur. DNR has policies and procedures around protection of cultural values and recently updated the procedure (PR14-004-010) on Discovery of Skeletal Remains or Cultural Resources. DNR maintains a confidential GIS layer of historic, archaeological, and cultural sites. All new sites are verified, catalogued, mapped, and included in the

GIS layer. During planning, these areas are flagged in the GIS layer. As per state law, these sites are protected by preventing the disclosure of their location. In each upland region, there is at least one trained and certified Cultural Resource Technician (CRT) who reviews timber sales and plans prior to approval. These sites are also reviewed by the state lands archeologist. The CRT and staff archeologists are available to verify a cultural resource if previously unidentified sites are found on a timber sale. Proposed timber sales are also reviewed by the Department of Archaeology and Historic Preservation prior to posting the sale for auction.

Objective 7 - Efficient Use of Fiber Resources: Timber sale contracts include clauses to ensure utilization targets are met. DNR conducts slash pile burning and mastication to manage harvest residue. Auditors viewed examples of successful slash pile burning. DNR's Forest Resilience Division works to ensure healthy forests and forest resilience to disease, insects, fire, and climate change. The Division is also tasked with putting prescribed burning back into the silvicultural toolbox.

Objective 8 - Recognize and Respect Indigenous People's Rights: The Washington state Department of Archaeology and Historic Preservation is responsible for implementing Executive Order 2102, which emphasizes tribal consultation. DNR meets regularly with Tribes in the state to discuss issues and concerns. Auditors noted that while DNR has a comprehensive program related to tribal relations, including multiple policies and procedures, the DNR website lists the last tribal summit as 2015. Also, it is the auditors' opinion DNR's work to recognize and respect Indigenous People's rights as excellent and, in that spirit, have issued an **opportunity for improvement (OFI)**, under 8.1.2, to post on their website their internal policies on tribal relations, the Commissioners Order and the Tribal government/DNR proclamation, Staff are offered regular training on tribal relations. There are 3 archeologists on staff and approximately 50 certified Cultural Resource Technicians (CRTs). All timber sales reviewed during the audit contained correspondence with affected tribes. Auditors heard that staff are encouraged to reach out to tribes early in the timber sale planning process. Documentation provided to the auditors demonstrates that, during planning for the HCP EIS, tribes were provided opportunities to review the EIS. Formal opportunities are provided through the SEPA process. Auditors heard, on one site visited, where Cedar trees had been identified how DNR worked with a local tribe so they could carry out the cultural practice of bark stripping. The tribe also used the practice as a teaching exercise for their youth.

Objective 9 - Climate Smart Forestry: DNR has a well thought out climate strategy that was adopted in 2020. The 20-Year Forest Health Strategic Plan is DNR's strategy for improving forest health and reducing wildfire risk in central and eastern Washington. The Climate Resilience Plan highlights actions DNR can take in response to projections that suggest Washington will experience increased temperatures and decreased precipitation during the growing season. The development of the 2020 Forest Action Plan involved the collaboration of multiple agencies and organizations. The 2020 Forest Action Plan details the analysis conducted on DNR lands and lays out the strategic action for each discipline. DNR reports annually to SFI on their climate change actions and the reports are also publicly available on their website.

Objective 10 - Fire Resilience and Awareness: DNR launched its prescribed fire program in 2021 aimed at creating a more resilient future forest. The prescribed fire program falls under DNR's Forest Resilience Division. DNR views prescribed fire as a critical tool in achieving objectives in the Forest Health Strategic Plan: Eastern Washington. The prescribed fire program includes training to increase the number of prescribed burn fire managers. In 2024, 13 prescribed fires are proposed in the Northeast, Northwest, Southeast and South Puget Sound regions.

DNR's Wildland Fire Management Division is the state's wildfire fighting force, responding to fires on more than 13 million acres of private and state-owned forest lands. Wildland Fire Management is responsible for interagency fire training. They also provide fire prevention and education programs aimed at the public, including community awareness about the risks of wildfires.

Objective 11- Legal and Regulatory Compliance: As a state agency, DNR must comply with all relevant laws and regulations. DNR has a strong system to achieve compliance with all laws and regulations that impact forest management. DNR staff interviewed during the audit were aware of these laws and regulations, especially the Forest Practices Act and rules. DNR staff receive training related to state legislation. DNR uses SEPA and the Forest Practices Application Review system (FPARS) as a public review process. DNR carries out compliance monitoring on all forest management activities and reports annually in the Forest Regulation Compliance Monitoring Report.

Timber sale and silviculture contracts contain language requiring conformance to state laws and regulations. For example, timber sale contracts require all bidders to be qualified under the Washington State Master Logger Program. Additionally, in 2015 the Washington State Logger Safety Initiative (LSI) was formed which promotes occupational safety in the logging industry. Logging contractors interviewed were members of LSI and had completed the Master Logger program, as required. Contracts also include a clause regarding no harassment. Washington state has equal pay and opportunities legislation. Additionally, Washington state has a Human Rights Commission that enforces the state law against discrimination. DNR has an equal opportunity and non-discrimination policy (PO 01-001) that delineates workers' rights.

Objective 12 - Forestry Research, Science and Technology: The Olympic State Experimental Forest (OESF) is a "working forest and living laboratory". DNR and a variety of agencies, universities, scientific partners, and external organizations carry out operational research trials in the OESF. DNR uses the OESF in an integrated approach of revenue generation, from timber sales, and research, to achieve the objectives in the HCP. Results of research are shared through newsletters, presentations, online videos, conferences and the OESF website.

DNR is an active member (participant) of the Washington SFI Implementation Committee (WASIC). DNR participates in regular meetings. WASIC partners have developed a fact sheet on species and communities of special concern, a landowner's guide to sustainable forestry practices in Washington, and the Master Logger Program. DNR programs (e.g., Natural heritage program) and information are cited on the WASIC website.

DNR has policies and procedures for regeneration assessments, growth and drain assessments, best management practices, and compliance regulations under the Forest Practices Rules. DNR has a Landowner Assistance tab on their website and programs to assist family forest owners. DNR reports annually to the Board of Trustees on the social, cultural, and economic benefits of the state trust lands. Under the HCP, DNR undertakes monitoring of landscape-level biodiversity assessments to meet objectives in the HCP. Auditors were impressed that DNR has adopted the use of drone technology in the Pacific Cascade Region to monitor activities such as silviculture treatments, recreation trails and illegal activities.

Objective 13 - Training and Education: DNR's commitment to SFI can be found on DNR's website on their certification page. Currently, there are 2.450 million acres (991,507 ha) of state-managed trust lands certified to SFI. One part-time position manages DNR's forest management certification program.

DNR has comprehensive and accessible online and in-person training opportunities for all staff. Some DNR training videos are publicly available on YouTube. DNR also uses promotional videos to encourage participation in training sessions for the public or staff, such as Prescribed Burn Manager training. Newly hired staff are required to take health and safety training in addition to DNR background training. Some training requirements are repeated annually. DNR staff have individual learning plans commensurate with their roles and responsibilities. Training records are tracked in the DNR Learning Management System.

DNR requires qualified logging professionals accredited through the Master Logger Program (MLP). This program is administered through the Washington State Contract Loggers Association. The program includes 4 days of coursework including silviculture, ecology, health and safety, and

compensation. Master Loggers must maintain valid first aid certification and complete continuing education credits annually.

Timber sale contracts state that “a purchaser shall have at least one person on-site during active operations that have completed training according to the requirements outlined within the SFI Standard.”

DNR is an active participant in WASIC contributing to brochures and technical papers related to forest management. WASIC offers college scholarships and works with the Washington State Contract Loggers Association on the Master Logger program.

Objective 14 - Community Involvement and Landowner Outreach: As a member of WASIC, DNR contributes financially and with in-kind support through sharing DNR programs and technical advice to WASIC participants. DNR works collaboratively with the science community on a variety of research and conservation programs, such as the Natural Heritage Program. Many of these research projects and conservation programs have helped further conservation funding and funding for other programs.

DNR maintains a landowner assistance program that provides landowners with valuable information such as financial and technical assistance for fuels reduction, wildlife stewardship, and wildfire preparedness. DNR has a Small Forest Landowner office that aids small landowners to “protect and promote ecological and economic viability” of their forest. There is a financial assistance program available depending upon the landowner’s needs.

The DNR website main page has a “Contact Us” tab that allows the public to comment or submit a complaint to DNR.

Objective 15 - Public Land Management Responsibilities: All DNR state trust lands and state forest lands are public. The public has several opportunities for involvement at the planning stage and before forest management activities take place. The HCP includes a summary of the comments from the public and how those comments were incorporated into the final EIS. Prior to a timber sale, DNR staff reach out to adjacent landowners and communities in the vicinity of the timber sale. Other formal methods to gain public feedback prior to a timber sale is through SEPA process and the Forest Land Planning Public Process. The Forest Land Planning Process reaches out to a wide selection of stakeholders and incorporates any feedback into management. Also, some Boards and Committees include public members (e.g., Forest Practices Board, Board of Natural Resources).

Objective 16 - Communications and Public Reporting: All past SFI public summary reports, dating back to 2005, are posted on DNR’s website on their forest certification page ([Forest Certification | WA - DNR](#)). The SFI summary report is also posted on the SFI website. DNR responds to the annual SFI survey and maintains and publishes copies of past surveys and reports as a demonstration of conformance to the 2022 SFI Forest Management Standard.

Objective 17- Management Review and Continual Improvement: DNR has a robust system for reviewing commitments and monitoring programs as well as procedures to evaluate the effectiveness of these programs. DNR reports annually to the Board of Trustees on each of the programs in terms of revenues, costs, and activities. DNR conducts effectiveness monitoring through the HCP, silvicultural monitoring, and northern spotted owl effectiveness monitoring. DNR also reports annually on timber regulation compliance monitoring. Internal reviews are conducted through the Forest Practices Board on proposed timber sales.

Outcomes of monitoring programs that result in changes to programs or procedures are communicated to staff through training, and meetings. Meetings include regular staff meetings, “all hands” meetings, Manager-level meetings, Division meetings, State Lands Operations team meetings, and various specialist team meetings. Also, there are monthly Board of Natural Resources meetings, Trustee meetings, and Tribal summits.

Auditors found DNR's staff to be creative and innovative; willing to explore new avenues to achieve a better result or more cost-effective result. DNR, as an organization, seeks staff input and uses it to make improvements to their management systems.

Findings

Previous non-conformances:

None.

Non-conformances:

1. **1.1.4 Periodic updates of forest inventory and recalculation of planned harvests to account for changes in growth due to productivity increases or decreases, including but not limited to: improved data, long-term drought, fertilization, climate change, changes in forest land ownership and tenure, or forest health.**

The SFI Standard requires periodic calculation of sustainable harvest levels to reflect changes in forest cover and growth & yield. The sustainable harvest calculation for the State is laid out in Statute and says that it must be re-calculated periodically. Policy PO-14-004 requires the recalculation of a SHL no less frequently than 10 years. Records and previous SFI reports record the last SHL for the east side covers the period 1996-2006 at 78.6 Mmbf/yr. Work is underway to produce a SHL for 2025-2034. DNR has purchased additional lands since 1996 but continued to use the 1996 SHL volume. DNR could not provide evidence that they had Board approval to continue with the 1996 SHL beyond 2006.

Opportunities for Improvement:

1. **3.2.1 Program addressing management and protection of water quality of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management.**

Auditors viewed examples of DNR BMP practices to protect water quality during logging, road construction, and other activities. However, auditors noted that there is no requirement that fuel nozzles be secured in either contractor or DNR trucks.

2. **8.1.2 The written policy shall be publicly available.**

There are multiple inward facing policies on tribal relations and commissioner's orders, and Tribal Government/DNR Proclamation. In the auditor's opinion DNR should consider making these outward facing.

Notable Practices:

1. **3.2.1 Program addressing management and protection of water quality of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management.**

Auditors issued a notable practice (NP) under this Indicator for the innovative measures to protect water resources. In one instance, DNR Roads Department used a cattle guard to capture runoff, from a steep decline, prior to the runoff reaching an important fisheries stream (see picture below). In another instance, DNR built a human beaver dam to slow the velocity of a stream protecting the road deactivation and crossing rehabilitation from erosion and protecting the downslope wetland.



Logo/label use:

Auditors reviewed logo and label use as DNR utilizes the SFI logo, words, and the abbreviation. SFI-approved signage was observed during the audit in a recreation area.

SFI reporting:

Auditors checked the SFI website to verify the previous audit report was submitted and posted. Auditors found the previous 2 audit reports are available on the SFI website. DNR has all SFI audit reports since 2005 on their website [Forest Certification | WA - DNR](#).

Review of Previous Audit Cycle

During the previous 5-year audit cycle, DNR received zero non-conformances and 8 Opportunities for Improvement (OFI's) in a variety of Objectives, including:

- Objective 1 – 1 OFI (2019) to increase accuracy in the Land Resource Manager
- Objective 2 – 1 OFI (2021) to explore additional techniques for wind firm retention patches
- Objective 3 - 1 OFI (2021) to more broadly share innovative tools with all Region staff
- Objective 5 – 2 OFIs (2019) to consider methods to minimize use of unauthorized ATV/UTV trails, and (2021) to review visual management policies in the Hood Canal District
- Objective 6 – 1 OFI (2018) to review the process for incorporating special features in the GIS database in a timely fashion
- Objective 9 – 1 OFI (2022) to complete collation of GHG emission data
- Objective 12 – 1 OFI (2020) to recommend collating public education efforts in one place

During the renewal audit, there were no non-conformances, one Opportunity for Improvement (OFI) under Objective 3.2.1 and two Notable Practices as follows:

- *Objective 4 – work done under the Good Neighbour Agreement (GNA), and*
- *Objective 15 – working with stakeholders.*

Conclusions

A closing meeting was held on May 16th at 4:30 pm in the Natural Resources Building, Olympia, WA. Auditors thanked DNR staff for their efforts on the audit. The Lead auditor gave an overview of the audit week specifically what audit work was completed to date. Each auditor spoke to their observations during the week and presented any non-conformances, OFIs or notable practices. There was one OFI from 2023, related to a bridge deck in the Olympic Region Block C-2700 Haul Road that was closed. The Lead auditor concluded the meeting with a recommendation for continued certification.

SEE SF61(s) FOR AUDIT NOTES