

FSC™ CERTIFICATION SYSTEM

FOREST MANAGEMENT CERTIFICATION RENEWAL AUDIT Public REPORT

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Washington State Department of Natural Resources South Puget HCP Planning Unit

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1 - Description and background of the applicant forest entity

1.1 - Legislative, administrative and statutory context*

Law/ regulation	Aspects of the forest management covered by the law (e.g. harvest monitoring, protection, health and safety, infrastructure, and other uses).	Responsible agencies	government
Legal rights to harvest			
Washington State Constitution	Washington State Constitution is the basic governing document of the State of Washington.	State Legislature	
Enabling Act of 1889	Legislation used to create the state.	Federal Government	
Taxes and fees			
RCW 82.32.290	Requires businesses and individuals to file business, sales, and property taxes.	Washington Department of Revenue	
Title 26 of the United States Code (26 U.S.C.).	Requires businesses and individuals to pay federal taxes	Internal revenue Service	
Timber harvesting activities			
Forest Practices Act (RCW 76.09)	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	Washington Department of Natural Resources	
State Environmental Planning Act	The State Environmental Policy Act (SEPA) process identifies and analyzes environmental impacts from governmental decisions. These decisions may be related to issuing permits for private projects, constructing public facilities, or adopting regulations, policies, or plans	Department of Ecology	
Endangered Species Act	Protects rare threatened and endangered species in the state. Notably the Spotted Owl, Salmonoids, and the Marbled Murrelet.	US Fish & Wildlife Service	
1997 Habitat Conservation Plan	The overarching plan covering DNR's forestlands within the range of the spotted owl. The HCP is targeted at improving spotted owl, marbled murrelet, and salmon habitat.	Washington Department of Natural Resources	
Salmon Recovery Act of 1999	This act covers all salmon bearing waters and requires the conservation of the species.	Washington Department of Natural Resources	
Clean Water Acts	Regulations with regards to any and all water discharges.	Washington Department of Natural Resources	
Shoreline	Legislation which mandates the	Washington Department of	

Management Act	protection of valuable shorelines	Natural Resources
Workers, local communities and indigenous peoples' rights (ILO conventions...)		
Occupational Safety and Health Act of 1970	The Act covers occupational health and safety of all workers in the state	The Washington State Plan is administered by the Department of Labor and Industries, Division of Occupational Safety and Health (DOSH)
Commissioner's Tribal Relations Order #201029, 2010	Defines the relationship between sovereign tribes and WDNR	Natural Resources
RCW 19.30 Farm Labor Contractor Act. RCW 26.28.060 Child Labor - Penalty. RCW 49.46 Minimum Wage Act. RCW 49.52 Wage Deductions, Agreed Wage. RCW 49.30 Agricultural Labor. RCW 49.78 Family Leave Act. RCW 49.76 Domestic Violence Leave RCW 49.77 Military Leave	Suite of labor laws are in place covering both domestic and foreign workers	Department of Labor
Trade and Transport (classification of harvested material, CITES, etc.)		
Title 46 RCW .01 to .98	The legislation and regulations related to the transportation of goods on public highways. Include documentation requirements, safety standards, licensing requirements etc.	Washington DOT
NAFTA	North American Free Trade Agreement covers the trade of goods and services within North America.	US Dept. of Commerce

From FSC-DIR-20-007

1.2 - General description and identification

Forest Management company	
Commissioner of Public Lands	Hilary Franz
Address	1111 Washington St. SE, Box 47014 Olympia, WA 98504-7016.
Telephone	360-902-1283
E-mail	Douglas.kennedy@dnr.wa.gov
Web site	www.dnr.wa.gov
Contact person (responsible) for FSC certification	Doug Kennedy
FSC trademark responsible	Doug Kennedy
Activity	forest management only
Annual turnover:	\$ 11,267,260.00 USD
Category of forest management	Natural forest

Number of forest workers (including contractors):	Forest field activity	Number (male) 56	Number (female) 16
	Administrative/office activity	Number (male) 11	Number (female) 11

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

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

1.3 - Other land use or activity in the forest included in the audit scope.

There is a wide range of activities carried out in forests within the South Puget HCP Planning Unit. Most uses are complementary to the forest management activities being carried out. There are extensive trail networks across the forests which accommodate hikers, bikers, all-terrain vehicles, and skiers. A variety of volunteer groups work with the Department to coordinate development, maintenance, and use of the trails.

Non-forest activity	YES/NO	Brief description	Impact or potential impact evaluation of such activities on the conformity with the requirements of FSC Standard
Industrial operations	No		
Mining	No		
Agriculture	No		
Hunting	Yes	Hunting is permitted by license on most State lands	All lands unless otherwise designated are open for hunting. This passive use does not generally impact conformance to the standard
Commercial tourism	No		
Traditional livelihoods	No		
Other non-forestry activities	Yes	The South Puget lands are used for a	Forestry activities are modified to accommodate the other uses.

		variety of hiking, biking and riding which are quite well organized and controlled.	
possible illegal or unwanted activities within the area evaluated	No		

2 - Scope of certificate

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

2.1.1 - Certificate

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

2.1.2 - Description of FMUs

Classification	Number of FMUs	Total forest area (ha ¹)			
		Privately managed	State managed	Community managed	Total
Less than 100 ha in area					
100 – 1000 ha in area					
1000 – 10 000 ha in area					
More than 10 000 ha	1		71,228 (176,005ac)		71,228 (176,005ac)
Meeting the eligibility criteria as					

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

SLIMF					
TOTAL			71,228		71,228

2.1.3 - Ownership and Use Rights

Name of FMU	Ownership	Use-rights (both legal and customary) of parties other than the certification applicant	Area (ha)	Longitude (E/W, degrees, minutes) AND Latitude (N/S, degrees, minutes)	Forest zone (boreal, temperate, subtropical, tropical) ²	Comments
South Puget	Public trust	Public access and recreation	71,228	47 02' 14" N 122 53' 50" W See map	Temperate	

2.2 - Product categories and main commercial timber:

List of Timber Product Categories available for sale as FSC-certified products				
Trade Name	Species (botanical name)	Product Type/ Nature (round wood, pulpwood,...)	Selling mode	FSC product claim
Round wood logs	Psuedotsuga menziesii Alnus rubra Thuja plicata Tsuga heterophylla Abies amabilis Acre macrophyllum Populus trichocarpa Abies procera Picea sitchensis Pinus contorta Pinus monticola	Round wood logs W.1.1	FOB	FSC 100%
Other non timber forest products -	Psuedotsuga menziesii Thuja plicata Abies amabilis Pinus monticola Gaultheria shallon Vaccinium ovatum Polystichum munitum Rhamnus purshiana	Conifer boughs, N10	FOB	FSC 100%

² According to the Holdridge life zone classification scheme: http://commons.wikimedia.org/wiki/File:Lifezones_Pengo.svg

The State sells roundwood logs either on the stump or harvested under contract, with the vast majority being stumpage sales. The primary species include: Douglas Fir (*Psuedotsuga menziesii*), Western Red Cedar (*Thuja plicata*), Western Hemlock (*Tsuga heterophylla*), Pacific Silver Fir (*Abies amabilis*), Noble Fir (*Abies procera*) and Red Alder (*Alnus rubra*). The State also sells the harvest rights for conifer boughs and brush from a variety of tree and shrub species.

2.3 - In case of partial certification.

The Department of Natural Resources manages approximately 850,000 hectares (2.1 million acres) of public trust lands throughout the State. The South Puget planning area is one of nine HCP planning units covering 71,228 ha.

When questioned about this being a partial certification the state responded; *“Washington DNR is fully committed to maintaining its FSC FM/CoC certificate. The agency continues to investigate market conditions for FSC-certified timber and remains open to the possibility of certifying additional state forestlands in the future provided market conditions would support that decision.”*

To ensure that there is no confusion between certified and uncertified timber, wood harvested from the South Puget planning area is demarked with unique marks and load tickets. Load tickets are controlled through the district offices.

All public trust lands outside of Puget Sound are similarly bound by the Forest Practices Act and the Policy for Sustainable Forests. Nine HCP planning units on the coast and the interior are managed under the Habitat Conservation Plan. Auditors have discussed management outside of this FMU with US Fish & Wildlife and were informed that management standards are consistent across the state and in compliance with federal law. The suite of laws and regulations listed above in 1.1 cover all elements of the Policy for Association and apply equally to all public trust lands throughout the State.

Ref : partial certification of large ownerships : FSC-POL-20-002

3 - In case of pre-evaluation audit

Not required on a second recertification.

4 - Managed forest description.

4.1 - Forest description

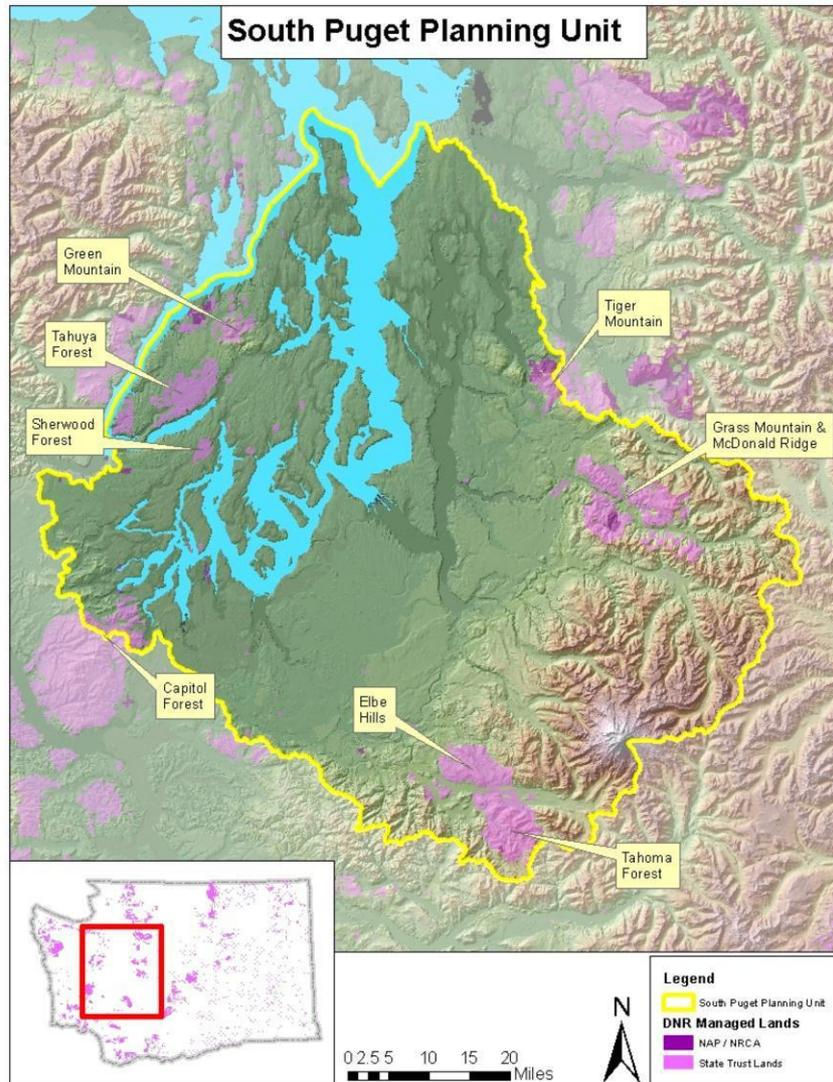
The South Puget HCP Planning Unit is located in west central Washington. It stretches from the cities of Everett in the north to Olympia in the south. The counties and parts of counties in this planning unit that contain DNR-managed lands are southern King, Pierce, eastern Thurston, north-central Lewis, 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

FSC™ Forest Management Certification
Initial Audit Report
WDNR – South Puget HCP Planning Unit

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 71,503 hectares of DNR-managed forested state trust lands, which are organized into eight landscape blocks (shaded areas of Map 1).

The South Puget HCP Planning Unit is a conifer forest as more than 90% of the

forest area is in conifer dominated forest types. The Douglas Fir cover type is the most prevalent accounting for 69.2% of the total forested area, while Western Hemlock types account for 15.5% of the forest area. Hardwood forests are primarily red alder and account for approximately 7% of the forest area.



Forest Cover Type	Acres	Hectares	
Black cottonwood	185	75	0.1%
Douglas fir	114,877	46,490	69.2%
Grand fir	256	104	0.2%
Bigleaf maple	685	277	0.4%
Noble fir	1,462	592	0.9%
Red alder	11,259	4,556	6.8%
Western red cedar	402	163	0.2%
Pacific silver fir	10,325	4,178	6.2%
Western hemlock	25,661	10,385	15.5%

Forest Cover Type	Acres	Hectares	
Western white pine	159	64	0.1%
True firs	516	209	0.3%
Others*	224	91	0.1%

*"Other" dominant forest cover types each comprise <100 acres within the SP HCP Planning Unit. Other forest cover types include cherry, lodgepole pine, Pacific madrone, mountain hemlock, Oregon oak, ponderosa pine, white alder, and willow.

The WDNR employs "cohort management" to implement even-age variable retention harvest methods so 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 and habitat development. Innovative methods are employed to create foraging and dispersal habitat for northern spotted owls. The audit team observed that a lot of thought goes into developing site-specific prescriptions to enhance habitat based on existing stand characteristics, and developing new methods to achieve a desired forest condition.

4.1.1 - Composition/ organisation of the certified forest(s) :

Composition of the Certified Forest(s)	FMU n° 1	TOTAL FMU
Total area of production forest (i.e. forest from which timber may be harvested)	66,743 (163,255 ac)	66,743
<i>Area of production forest classified as "plantation"</i>		
<i>Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems</i>	57,167 (141,259)	57,167
<i>Area of production forest regenerate primarily by natural regeneration or by a combination of natural regeneration and coppicing of the naturally regenerated stems</i>	9,306 (22996)	9.306
Area of forest and non-forest land protected from commercial harvesting of timber		
<i>and managed primarily for conservation objectives</i>	4,755 (11,750)	4,755
<i>and managed primarily for production of NTFPs or services</i>		
Area of forest classified as "high conservation value forest":	73 519*	73 519*
Total area	71,228 (176,005)	71,228

Note: HCV Area is the total for each class and includes a significant amount of overlapping HCVs. For example, the 10,000 ha protected watershed also includes a significant area in spotted owl habitat.

4.1.2 - Environmental main characteristics of certificated area.

4.1.2.1 - Presence of HCV :

The South Puget HCP Planning Unit FMU has more than 70,000 ha classified as High Conservation Values (HCVs) covering four of the six HCV types. There are overlaps between the types, for example a HCV 1.1 protected area lies within an HCV 1.2 spotted owl conservation area. The rich ecosystems of this region support a number of RTE species such as Northern Spotted Owl (*Strix occidentalis caurina*) and Marbled Murrelet (*Brachyramphus marmoratus*) whose habitat must be protected. In cooperation with the City of Tacoma the State manages Trust Lands within City's watershed to preserve water quality and quantity. There is also a significant area of forest within riparian zones which are designated and protected by the State.

TYPE of HCFV	PRESENCE	LOCALISATION	Notes
HVC1: Forest areas containing globally, regionally or nationally significant concentrations of biodiversity values.			
HVC 1.1 : Protected area	4,755 ha		Natural Areas
HVC 1.2 : presence of Threatened and endangered	405 ha & 33,460 ha		Marbled Murrelet and Northern Spotted Owl conservation areas
HVC 1.3 : Concentrations of endemic species			
HVC 1.4 : Concentrations of critical temporal use			
HVC2: Forest areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.			
HVC3 : Forest areas that are in or contain rare, threatened or endangered ecosystems.			
	1,057 ha		S1,S2,G1,G2 Natural Heritage plant communities
HCV 4 : Forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control)			
HVC 4.1 : Forests critical to water catchments	10,845 ha		Trust Lands within City of Tacoma Watershed
HVC 4.2 : Forests critical to erosion control	22,480 ha		Riparian Areas (RTE & biodiversity values also)
HVC 4.3 : Forests providing barriers to destructive fire			
HCV 5: Forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).			
HCV 6: Forest areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).			
	517 ha		Recorded & buffered cultural resource sites

NOTE: Areal hectare values are not exclusive, i.e. HCV types overlap. More than 50% of the FSC certified land base is classified as HCV.

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

The Washington Department of Natural Resources uses chemical herbicides sparingly. In 2017 the State treated 270 hectares with 1,570 litres of product. WDNR utilizes a variety of herbicides to control vegetation in regenerating forests as either part of the site preparation process or after establishment to releases seedlings to grow freely.

Herbicide	Active Ingredient	Reason	Liters
CHOPPER	Imazapyr	Vegetation Management	517
CLOPYRALID 3	Clopyralid	Site Preparation	25
GARLON 4	Triclopyr	Vegetation Management	26
GARLON ULTRA	Triclopyr	Vegetation Management	9
GLYPH5.4	glyphosate	Vegetation Management	517
OUST EXTRA	Sulfometuron methyl	Site Preparation	34
TRANSLINE	Clopyralid	Site Preparation	442
Grand Total			1570

The State does not apply any of the chemicals listed on the FSC list of highly hazardous chemicals.

4.3 - List of commercial timber and non-timber species, sustainable rate of harvest and annual commercial production

4.3.1 - Timber forest products :

Harvest rates are set every ten years through a public planning process. Annual allocable cut levels are set as the sustainable harvest level for a 10 year period based upon a long-term forecast of harvest volumes, forest conditions, habitat supply and silvicultural investment – after having satisfied numerous constraints. Timber harvests are not regulated on an annual basis and large swings in volumes harvested are typical in a system where a stumpage buyer has two or more years to harvest their sales.

Available Timber Volumes					
Species		2016	2017	Avg	10 yr AAC
Cottonwood	Populus trichocarpa	179	377	1,115	
Douglas fir	Psuedotsuga menziesii	94,472	169,427	122,225	
Grand Fir	Abies amabilis	-	760	167	
Hemlock	Tsuga heterophylla				

Available Timber Volumes					
Species		2016	2017	Avg	10 yr AAC
		21,695	32,273	40,480	
Lodgepole	Pinus contorta	1,505	20	1,579	
Maple	Acre macrophyllum	918	3,320	1,365	
Noble Fir	Abies procera	444	77	1,100	
Other		-	-	118	
Red Alder	Alnus rubra	3,631	8,527	5,415	
Red Cedar	Thuja plicata	877	6,610	3,241	
Silver fir	Abies alba	9,139	11,832	11,765	
Spruce	Picea sitchensis	-	5	33	
White Pine	Pinus monticola	959	536	574	
Total		133,819	233,764	189,175	194,940

Data Source: DNR Pre-Sales System, 09/18/17

4.3.2 - Non-Timber Forest Products

Non-Timber Forest Products			
Species (common name)	Species (botanical name)	Product and use	Approximate annual production (bunches)
Salal	<i>Gaultheria shallon</i>	Floral Greens	1,502,984
Huckleberry	<i>Vaccinium ovatum</i>	Floral Greens	35,732

5 - Social context of certificated area.

“Washington DNR was established in 1957 with the consolidation of several state agencies, boards and commissions to serve, in part, as the manager of state trust lands. In addition to managing forested state trust lands, DNR manages trust lands in agriculture and grazing production, and commercial real estate. DNR also is steward of the state’s aquatic lands and natural areas. All together, DNR cares for more than 5 million acres of state-owned lands. DNR also administers several regulatory programs and acts as the state’s principle wildfire

control agency. The agency is led by the Commissioner of Public Lands, a statewide-elected official.

More than half the acres that DNR manages are state trust lands, which provide substantial revenue to specific trust beneficiaries (the trusts) to benefit the people of Washington. State trust lands provide needed revenue to construct and maintain Washington’s public schools, universities, prisons and state office buildings. Other state trust lands help fund fire departments, hospitals and other public services in many counties, and contribute to the state general fund, earmarked for education.

State trust lands also provide jobs, commodities, clean water, wildlife habitat and recreational opportunities. DNR manages state trust lands to provide these additional benefits while maintaining the primary goal of trust revenue production. As steward of these lands and natural resources, DNR relies on a diverse staff of foresters, engineers, geologists, biologists, cartographers, hydrologists, soil scientists, economists, and others.” (Policy for Sustainable Forests, p.10)

As a progressive public agency the Department provides a range of training and learning opportunities to its staff. The Department has a culture of safety and provides health and safety training to all staff. Contractors are required to provide proof of training in health and safety, environmental management and forest operations.

The State has a formal employee dispute resolution process which is supported by the public services collective bargaining agreement.

6 - Forest management plan description

6.1 - Main description of management system

Topic	Description and notes
Management objectives and principles	<p>Management objectives for the South Puget Sound HCP forest management unit are developed in a public planning process and must be consistent with Department objectives and mandates. The department has mandates which include sustainably managing state trust lands and revenue objectives which provide funding for public education and infrastructure throughout the state.</p> <p>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:</p> <ul style="list-style-type: none"> ➤ minimize the extent of the road network and its environmental impacts ➤ 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

Topic	Description and notes
	<p>potential, and reduce financial risks to the trusts by diversifying the land base, both among and within each asset class</p> <ul style="list-style-type: none"> ➤ 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.
Forest resources (socio-economic conditions, forest composition, profile of adjacent lands)	<p>The South Puget HCP Planning Unit is a conifer forest as more than 90% of the forest area is in conifer dominated forest types. The Douglas Fir cover type is the most prevalent accounting for 69.2% of the total forested area, while Western Hemlock types account for 15.5% of the forest area. Hardwood forests are primarily red alder and account for approximately 7% of the forest area.</p> <p>Each year, public institutions receive millions of dollars in trust revenues from timber harvesting, communication sites, and a few commercial properties. Since 1970 the forested state trust lands have produced more than \$4.55 billion. Management of state trust lands also supports local economies by supplying jobs in the forest and agricultural industries to nearby communities. Some niche industries depend on products from trust lands. In addition, these lands often attract recreationists who spend money in these communities.</p> <p>Finally, the supply of wood products from state trust lands helps maintain the infrastructures of the forest and agricultural industries and the rural economies that depend on them. Moreover, this forest management occurs with strict environmental protection, so that local use of wood products from these lands tends to reduce importing products from forests outside Washington that may not be managed sustainably or that do not meet the State's high standards.</p> <p>State Trust Lands are located throughout the South Puget HCP planning area (Map 1). Adjacent land owners range from industrial forest lands, to small private landowners to agricultural lands, and State and municipal parks.</p>
Silvicultural and/or other management systems being implemented (incl. harvesting techniques and equipment, rationale for species selection)	<p>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. Riparian areas are managed under uneven-aged regimes.</p> <p>The silvicultural system employed by WDNR 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.</p> <p>Qualified contractors carry out timber harvesting and road construction activities. Almost all 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.</p>
Environmental safeguards	<p>The Washington Department of Natural Resources has an extensive set of procedures and guidelines that guide forest management activities. Staff and contractor training is required to operate.</p>
Management strategy for the identification and protection of rare, threatened and endangered species	<p>The State has employed a variety of studies and surveys to support its Natural Areas and Natural Heritage programs. Identification of RTE species is listed federally and habitat is managed</p>

Topic	Description and notes
	by the state based on USFW direction. Under federal law the State is implementing Habitat Conservation Plans for both Spotted Owl and Marbelled Muralet. Under these plans the state has committed to protecting Roosting, Foraging and Dispersal habitat for each species as part of their forest management program. The implementation of these plans is monitored by the USFW and the Department.
Certificate holder's procedures for monitoring growth, yield and forest dynamics (incl. changes in flora and fauna), environmental and social impacts, and costs, productivity, and efficiency	<p>The Washington Department of Natural Resources has an extensive set of monitoring programs that are applied across the forest management unit. This includes:</p> <ul style="list-style-type: none"> ➤ Preharvest surveys ➤ Operational monitoring ➤ Survival assessments ➤ Stocking assessments ➤ HCP Implementation monitoring ➤ Old growth surveys ➤ Habitat assessments ➤ Recreational use assessments ➤ Conservation area assessments <p>All surveys are used to ensure that management and operational objectives are being met and to ensure that operations are not negatively impacting the environment. Additionally, all forest operations of the Department are subject to the provisions of the Forest Practices Act and are monitored by the Forest Practices Division of the Department (a separate organisation).</p>
Management structures (e.g. management structure, division of responsibilities, use of contractors, provision of training, etc)	The South Puget HCP Planning Unit is organized into eight 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 WDNR. Fifty local (region) WDNR 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.

6.2 - Production and harvesting

Date of data: Oct 31 2017

	Volume summaries, m3		
	Hectares	Volumes	
Final felling	127		
First thinning	129		
Secondary thinning			
Seed tree felling			
Other thinning			
Total	256	233,764	

Approximate annual biologic production, if relevant: 588,000 m³/year
Approximate intended harvesting volume (annual allowable cut (AAC)): 199,900 m³
(38,982 MFB)
Approximate annual harvesting rate (AAC / total available volume): 34%

6.3 - Identification, traceability and monitoring of products, for joint FM and CoC certificates

Washington DNR has a series of procedures in place to ensure the traceability of their FSC certified wood. All contracts and sales documents identify that the sale is FSC certified.

For every load which leaves the site a trip ticket is issued which accompanies the tuck to its destination. All load tickets get reconciled against a load report from each landing and the tickets received by the mill.

6.3.1 - Description of the implemented systems to ensure the traceability

The traceability of FSC certified timber is ensured through the use of unit load tickets which are provided to the producer, the trucker and the destination.

6.3.2 - Description of the final location of taking in charge

All loads are delivered to a licensed mill, where they are weighed on government certified scales.

6.3.3 - Description of the documentation or of the marking system

Each load of FSC certified wood is accompanied by a specific load ticket which identifies the origin of the timber, the logger, the trucker, the destination, FSC claim and WDNR's FSC certification code.

6.3.4 - Evaluation of the mixing risk

The risk of mixing is low due to use of load tickets, trained drivers, and pure loads.

7 - In case of Transfer Audits

Not Applicable

8 - Base of evaluation, audit process.

8.1 - Composition of the audit team

Evaluation Team (main assessment)	Notes and CV of team member
--------------------------------------	-----------------------------

Team Leader	Brian Callaghan RPF EP(EMSLA), FSC FM qualified lead auditor on behalf of Bureau Veritas Certification, Forest planning, operations, roads, independent consultant.
Auditor 1	Richard Boitnott CF, FSC FM qualified auditor on behalf of Bureau Veritas Certification, wildlife habitat, forest monitoring, independent consultant.
Auditor 2	Craig Howard RPF, FSC FM qualified lead auditor on behalf of Bureau Veritas Certification, wildlife habitat, operations, pest management, independent consultant.
Auditor 3	Sarah Bros RPF, FSC FM qualified lead auditor on behalf of Bureau Veritas Certification, forest regeneration, forest planning, harvest operations, independent consultant.
Local Specialist (Forester and ecologist)	
Local Specialist (social)	
Trainer	
Peer Reviewers	Notes
Peer Reviewer 1	
Peer Reviewer 2	

8.2 - FSC Forest management standard used.

8.2.1 - Reference of the national/sub-national FSC standard used:

FSC US Forest Management Standard (v1.0) July 8 2010,
<https://us.fsc.org/download.fsc-us-forest-management-standard-v1-0.95.htm>

8.2.2 - Description of the process of local adaptation of the FSC international or generic standard*

Not Applicable

8.3 - Description of the audit program.

8.3.1 - Main audit schedule and last survey audit schedule

Date: October 31 2017

Time	Activity	BVC Repr.	Company Repr.
09:00 AM	Opening Meeting	Team	Kennedy/Yourd
09:30 AM	WDNR update	Team	Kennedy/Yourd
10:00 AM	Field work Logistics	Team	Kennedy/Yourd
11:00 AM	Document Review Callaghan P5 P7 Howard P6 Boitnott P8, P2 P4 Bros P1,P3, P9	Team	Kennedy/Yourd
12:00 PM	Lunch	Team	Kennedy/Yourd
01:00 PM	Document Review continued	Team	Kennedy/Yourd
04:30 PM	Daily debrief	Team	Kennedy/Yourd
05:00 PM	Depart site		

Date: November 1 2017

Time	Activity	BVC Repr.	Company Repr.
07:30 AM	Depart Olympia	Team	Kennedy/Yourd
08:00 AM	Field Tour – Tahoma - Tahuya	Team	Kennedy/Yourd
04:00 PM	Return Olympia	Team	Kennedy/Yourd
04:30 PM	Daily Debrief	Team	Kennedy/Yourd
05:00 PM	Depart		

Date: November 2 2017

Time	Activity	BVC Repr.	Company Repr.
07:30 AM	Depart Olympia	Team	Kennedy/Yourd
08:00 AM	Field Tour – Delphi - Black Diamond	Team	Kennedy/Yourd
04:00 PM	Return Olympia	Team	Kennedy/Yourd
04:30 PM	Daily Debrief	Team	Kennedy/Yourd
05:00 PM	Depart		

Date: November 3 2017

Time	Activity	BVC Repr.	Company Repr.
07:30 AM	Depart Olympia	Team	Kennedy/Yourd
08:00 AM	Woodward Bay Natural Resource Conservation Area – state natural areas program	Team	Kennedy/Yourd
12:00 PM	Document review & Compile Findings (auditors rendezvous)	Team	Kennedy/Yourd
04:00 PM	Closing Meeting	Team	Kennedy/Yourd
05:00 PM	Depart		

Statement of the total person days spent for survey assessment:

Activity	Nb. of man/day
Preparatory work	1
Audit activity on field	15
Stakeholder consultation	1
Report writing	3
TOTAL	20

8.3.2 - Clear description of the sampling system employed to select FMUs or sites for evaluation AND RATIONALE*

Field samples were selected from areas which have been operated over the past five years. For each of the four districts an initial site was randomly selected and used as an anchor for other sites in the district. During the audit 25 field sites were inspected by the auditors. Sites included areas which had been harvested, renewed, and/or tended. Three recreational sites (trail heads for hiking and ORV trails), one Natural Resource Conservation Area (NRCA), several water crossings, and a variety of HCV sites including riparian areas, spotted owl habitat, marbled murrelet habitat, and source water protections areas.

Site	Date	Auditors	Comments
Hungry Hippo	01-Nov	RB CH	Planned timber sale along rec trail. A lot of outreach to local neighbors and interested parties. Notification of timber sale on rec board. Small sale-7 acres variable retention harvest. Left buffer along road to address visual quality. Will not apply herbicides to the site for site preparation due to neighbor concerns. Discussed timing restrictions due to potential marble murrelet habitat. Sale is in review. No contract, Sale is laid out, Everything marked on the ground, 7 acres total area Probably 2 days to harvest, Timing restriction to accommodate high use recreation , Small entries. Visually pleasing. No herbicide due to neighbours. So plant higher density more quickly 2 to 4 slashings to get growth

Site	Date	Auditors	Comments
Lollipop	01-Nov	RB CH	Reviewed rutting guidelines. Procedures say the will allow 12 inch ruts over the entire unit, but really don't allow it. Reviewed CoC procedures. Some units of this sale are FSC certified, some are not. Section G115 of the contract does not specify the units that are not FSC certified versus those that are. However, there is a clause deeper in the contract that states the units that are certified. This issue probably goes away. 30000 bf per acre Good sites 50000 bf per acre 18 acres Probably 1000000 bf from site, New road , Power line. Need 50 foot clearance Gas line needs 5 feet of fill on top. Timing restriction marbled murelet for potential habitat
Waddel Divide	01-Nov	RB CH	Regen site. No chemical site prep again due to neighbor concerns. Site did not have adequate regen after the first year, so interplanted to get to 350 TPA. Not as much as they like (400TPA), but will be enough. A ¼ acre portion of the unit has no survival. Rocky south slope difficult to regen. 250 year old legacy tree will be left with a clump around it Legacy tree strategy in HCP., Marbled murelet habitat, Recreational map is available for download Harvest area overlapped on map. Good public notification process
Copper Ridge:	01-Nov	RB CH	Research site on group selection, patch clearcuts, thinnings, and variable retention harvests. Trying to determine the effect of different treatments on aesthetics and impacts on regen. As expected, there is an effect on the growth of regen in small patches due to shading effect. Growth aesthetics. How do we make it look good, Hemlock and cedar planted at 50 trees per acre Doug fir planted at 200 trees per acre Tribal access. Medicine Creek and Point No Point Working on access agreements , Formalizes that tribes have right to be here. Dual lock system...allows tribal members vehicle access ...how to manage the gates... hunting and other uses permitted
Sterling	43040	RB CH	Regen site. And once again, no chemical application due to neighbor concerns. The tract is close to a heavily used and populated lake. Neighbor concerns about harvesting on sediment delivery into the lake, which is used as a water source for residents. A lot of variable retention left on the unit to address visual quality.
Erl Gray	43040	RB CH	Planned harvest, one unit across the road from Sterling. Reviewed timing restrictions due to nearby suitable marbled murrelet habitat. Reviewed SEPA process for gathering input from interested parties. Neighbors were mostly concerned with visual impacts.
Snickers	02-Nov	RB BC	Another planned harvest unit. Reviewed road construction project. No water crossings, so no issues. Just a standard road construction project. Most interesting thing was the ability to use material gathered from on-site instead of having to truck material from off-site

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Site	Date	Auditors	Comments
Benny Beaver	02-Nov	RB BC	Active harvest. Interviewed contract administrator to review inspection processes. Reviewed retention on the harvest unit. One large patch was close to the landing. Put there due to a wet bowl that was most suited to retention, not logging
Old Foggy	02-Nov	RB BC	PCT. Stand was at about 400 TPA. Reduced stocking to about 300. Selection criteria are western red cedar first, Douglas fir second, western hemlock third. Surrounding stand had more than the normal 8 TPA retention. Left about 12 TPA to address aesthetics. Stand was visible from the main road to Mt Rainier
ORV Trail	02-Nov	RB BC	Reviewed process for dealing with a variety of recreational interest groups. The agency does a lot of outreach to user groups. Are building a new campground since the existing one is being overused and crowded. Popular spot.
Park Bench2	02-Nov	RB BC	Combination of planned harvest and in-process (but not active at the time of the audit). Revised two different thinning prescriptions to facilitate foraging and dispersal habitat for the Northern Spotted Owls. The goal is to provide good habitat for the Northern Flying Squirrel, which is the primary prey for NSOs. Thinning prescriptions are based on the individual stand conditions. Stands that were previously thinned get one prescription versus those that have not been thinned
Flashback	02-Nov	RB BC	Reviewed recently completed thinning designed to facilitate NSO habitat. Stand was thinned to a lower density than other stands observed during the audit, but original stand conditions provided the prescription. The goal is to facilitate a multi-layer stand by allowing sunlight to hit the ground. This stand has no on-the-ground vegetation, so opening it up will encourage the understory growth needed for flying squirrels
Gale FMU	01-Nov	BC SB	interviewed Brian Williams re: silviculture; viewed 2009/10 Douglas Fir plantation, tended, no mechanical SIP (7 ha)
Gale Force FMU 77222, 94522, 96315	01-Nov	BC SB	interviewed Tyler Traweek, Ted Keeley, Scott Sargent (Regional Mgr), Keith Yonaka (Engineer); road construction ROW cutting; discussion re: crushed culverts; active harvest operation (80 ha)
Now & Later FMU 87602	01-Nov	BC SB	looked at completed plant Noble Fir bareroot & 1-yr container stock planted; interviewed Brian Williams (Silviculture Forester) (16 ha)
Black Diamond, water crossing	01-Nov	BC SB	discussed how pipes installed, types of pipes used, issues with flash floods; interviewed Keith Yonaka (Engineer)

Site	Date	Auditors	Comments
bridge over North Fork Green River	01-Nov	BC SB	discussed reason for bridge location due to washout, issues with contractor, easement with city of Seattle; interviewed Bryan King (Tacoma Watershed Mgr), Brian Ballard (Watershed Forester) both for city of Seattle
Viva la Bam, FMU 68871	01-Nov	BC SB	interviewed Brian Williams (Silviculture Forester), Tyler Traweek (Unit Forester); discussed recent PCT, instability slope issues, special management area (SMA) for wildlife & riparian buffers, snag retention for wildlife; observed Ce, He & Noble Fir natural regen; discussed gate to deter public use of private land (14 ha)
Running Elf, FMU 41294	02-Nov	SB CH	observed Marbled Murrelet no cut buffer (pic2678), walked Mission Ck trail through cut, reported state ctrcts 2 mill bf of Douglas Fir annually; interviewed Nathan McReynolds, Jesse Sims (user group) re: use of trails; reported ~250k users annually
Tahuya 4x4 trail	02-Nov	SB CH	interviewed Mike Welander (Quadra Paws) re: trail users; Ray Minish (in charge of Recreation for State); observed off-road trail constructed with grant \$140,000 + 300 volunteers (pic2770,2772); discussed how user group manages the trails for the State & State provides funds and enforcement; approx. 350 km trail on DNR land; told Quadra Paws est. 1994 (website); told on ave. get 30-35 people use trails
Belfair, Thin Mints, FMU 89555	02-Nov	SB CH	(17 ha) recent harvest (2016); discussed prescription for renewal to plant with 2-yr old plugs Douglas Fir (pic2778); grown in DNRs nursery; discussed scotch broom issue and mitigative measures (removal by hand); viewed herbicide spray
Belfair, King Anderson, FMU	02-Nov	SB CH	viewed 2014 harvest (21 ha) adjacent to community; discussed issues with access control and enforcement; interviewed (DNR Police) Neil Shuster re: issues with unlawful removal of firewood, unauthorized public access with quads; discussed noxious weed control of Scotch broom - hand removal; interviewed Brian Williams (Silviculture Forester); discussed crossing removal that public now driving through
Belfair, Muffet FMU 39591	02-Nov	SB CH	viewed active harvest block (5 ha) (pic2781); walked riparian reserve (pic2788,2790); interviewed Nathan McReynolds (Unit Forester)
Belfair, Good Seed FMU 18661	02-Nov	SB CH	viewed small 1 ha fire summer 2017(pic2801,2803); interviewed Nathan McReynolds & Brian Williams; discussed scotch broom problem in block (pic2805,2810)
South Puget HCP, Woodard Bay	03-Nov	SB BC	viewed conservation reserve within city of Olympia; interviewed Laurie Benson (Conservation Mgr), Pat & Al Wald + Roy Short (Friends of Woodard Bay) re: how they manage the reserve; DNR explained as residential properties go for sale DNR purchase land with grant & removes bldgs & regenerates land; told how only walking allowed on trails; local school programs use the trails; Friends look after the trail and bldg mtce (pic2821,2823-2825,2834,2835-38)

8.4 - Documents review

Administrative and legality

- South Puget, HCP Planning Unit Forest Land Plan Final EIS
- Timber Sale Contract Clause and Administration Manual.
- Silviculture Contract Templates
- Forest Land Planning Public Process Example: SPS Scoping: Local Knowledge / Stakeholder workshops

- SPS Brush Lease Examples

Internal social issues

- *DNR agency-wide safety survey*
- DNR's Safety Survey 2011 Results (email & presentation)
- Training Book for the Forester 1 – State Lands
- State Lands Quality Initiatives Memo on improving training

External social issues

- Tribal Relations Website(s) (WADNR and SharePoint)
- Commissioner's Tribal Relations Order #201029, 2010
- Logger Safety Initiative
- Safety Standards for Logging Operations
- SIC Recommendations for Qualified Loggers
- Forest Land Planning Spatial Layer Info w/public comments
- DNR Social Impact Assessment Summary
- Final Environmental Impact Statement on Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington and for Determining the Sustainable Harvest Level
- Process: Notifying adjacent landowners re Timber Sale
- Snoqualmie Corridor Recreation Plan — March 2015

Environmental and HCVF

- DNR SEPA Handbook SharePoint Site
- PO14-008 Old Growth Policy
- PO14-009 Wildlife Habitat Policy
- PO14-010 Watershed Systems Policy
- PO14-011 Riparian Conservation Policy
- PO14-012 Special Ecological Features Policy
- PR14-004-046 Identifying and Managing Structurally Complex Forests to meet Older Forest Targets
- PR14-004-170 Talus Fields
- PR14-006-090 Cohorts, Legacy, Leave Trees
- DNR's Natural Areas Program Information (Sept 2015)
 - Natural Area Preserves locations/descriptions
 - Natural Resource Conservation Areas locations
- Natural Heritage Plan
- DRAFT Special Ecological Features Procedure (March 2015)
- HCP (Habitat Conservation Plan) 1997

Management and harvesting operation

- DRAFT Environmental Impact Statement On Alternatives for Establishment of a Sustainable Harvest Level for Forested State Trust Lands in Western Washington
- DRAFT_South_Puget_FSC_EIS on SHL 2017_10_31
- Planning & Tracking Database
- Timber Sale Contract Clause and Administration Manual
- Timber Sale Logging Plan of Operations form
- Black Diamond Field Package
- Elbe Field Packages
- Delphi Field Packages
- Belfair Field Packages
- Woodward Bay Package

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Monitoring process

- Average annual cut / annual growth for south Puget (growth / yield)
- Planning & Tracking Database
- Sustainable Harvest Calculation Packet – Westside..
- Sold Sales in South Puget HCP Planning Unit.....
- Natural Heritage Monitoring / Volunteer / Partnership
- DNR Annual Report 2015, 2016

8.5 - Interview and stakeholders input and treatment.

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

Involved people		
Category	Name	Position
Manager	Angus Brodie	Deputy Supervisor for State Uplands
	Dan Stonington	Policy Director
	Duane Emmons	State Uplands Budget Manager
Employee(s):		
	Andy Hayes Allen Estep Doug Kennedy Hannah Young David Bergvall Calvin Ohlson-Kiehn Kristen Ohlson-Kiehn Mike Buffo Sara Palmer Division Manager Assistant Division Manager – HCP and Scientific Consultation Program Lead, Forest Certification Forest Certification Specialist Assistant Division Manager – Forest Informatics and Planning Assistant Division Manager – Silviculture Assistant Division Manager – Planning Environmental Planner State Lands Archaeologist	
	Product Sales and Leasing Division (PSLD) Staff: Darin Cramer Division Manager	
	Conservation, Recreation, and Transactions (CRT) Staff: Brock Millern John Gamon Tim Stapleton Division Manager Assistant Division Manager – Natural Areas/Natural Heritage Assistant Division Manager – Recreation	
	Engineering Division (ENG) Staff: Alex Naggygyor Assistant Division Manager – Roads Section	
	South Puget Sound Region Staff: Scott Sargent Dean Adams Laurie Benson Brian Williams Dave Oulter Alan Mannwaring Keith Yonaka South Puget Sound Region Manager Assistant Region Manager – State Lands (Product Sales, Land Management, Engineering) Assistant Region Manager – State Lands (Asset Management, Recreation, Natural Areas) Intensive Management Forester – South Puget Sound Region Intensive Management Forester – South Puget Sound Region Wildlife Biologist – South Puget Sound Region South Puget Sound Region Engineer	
	Ted Keeley Brandon Mohler Nancy Barker Michelle Bell Kevin Carlisen Mike Fowler Craig Higbee District Manager – Rainier District Forest Manager – Elbe Unit Recreation Manager – Elbe Unit Engineer – Elbe Unit Forester – Elbe Unit Forester – Elbe Unit Forester – Elbe Unit	
	Lee Roach Nathan McReynolds Jesse Sims Ray Minish District Manager – Hood Canal District Forest Manager – Belfair Unit Recreation Manager – Belfair and Hoodsport Units Recreation Forester – Belfair Unit	
	Andy Ritter Phil Wolff Kristen Bloomfield Forest Manager – Delphi Unit Recreation Manager – Delphi Unit Forester – Delphi Unit	
	Tyler Traweek Dan Eide Forest Manager – Black Diamond Unit Rights of Way Manager – Black Diamond Unit	
	Pacific Cascade Region Staff Maureen Crabtree Jacob Oberlander Intensive Management Forester – Lewis District Forester – Three Corner Rock Unit	

8.5.2 - Stakeholders identification and consultation process

Stakeholders were first identified and were formally consulted prior (Sept 14 2017) to this recertification audit. The stakeholder list has been updated to reflect name changes of various members as appropriate.

8.5.3 - Record of stakeholder received comments or complaints*

Stakeholders reference (name / type)	date	Received comment or complaints	Theme (social, economy, environment)	Checked on site? (YES or NO)	Answer from the certificate holder	Answer from Bureau Veritas
Institutions/individuals informed about the evaluation						
Notices were sent to 100 groups or individuals	9/14/17					
Individuals who were interviewed						

City of Tacoma	1/11/17	WDNR owns the lands surrounding the city's water supply. They work cooperatively with the city to ensure water quality is maintained,	Social, environment	Yes		
QuadraPaws 4X4 Club	2/11/17	Only positive things to say about WDNR and how they cooperate on trails and rec areas	Social -recreation	Yes		
Logger	2/11/17	The logger was very supportive of WDNR he enjoys working on their lands. His only concern is the landing location which could be more accommodating to setting up cable logging jobs.		yes	WDNR is always willing to work with loggers to improve operations.	
Friends of Woodard Bay	3/11/17	The group are volunteer stewards of the Woodward Bay site. They have a cooperative relationship with the state and feel empowered.	Social, environment	Yes		
Individuals who contributed information in writing						

8.6 - Other evaluation techniques*

None

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

A closing meeting was held at the Washington DNR offices in Olympia November 3 2017. The meeting covered the audit process, audit findings, confidentiality, appeals & complaints, and next steps. The audit team provided a positive recommendation toward the audit.

9 - Audit team observations

9.1 - Evaluation results with reference to the FSC referential / standard by criteria

PRINCIPLE 1: Compliance with law and FSC Principles

WDNR was found to be in compliance with all applicable laws and regulations. The Department carries out a variety of compliance monitoring activities, related to both the Habitat Conservation Plan and the State Forest Practices Act. WDNR 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.

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

During the field tour auditors saw a decommissioned water crossing that was regularly being traversed by ATVs. Auditors were told enforcement was monitoring the situation and an application for funding to block the water crossing from ATV access was had been submitted. A WDNR enforcement officer arrived during the site visit confirming that there is regular enforcement. Auditors are satisfied DNR has a system in place that is working, to address the issues in this situation

WDNR manages timber harvests from forested state trust lands in a manner consistent with accepted best practices for sustainability. WDNR is a public agency that manages trust lands for benefits of the endowed public institutions. As a public agency WDNR does not directly pay property taxes. Private lessees pay leasehold tax and the natural areas program pays 'Payments in Lieu of Taxes (PILT) for NAP and NRCA sites.

The South Puget HCP Planning Unit is one of nine HCP planning units. It is the only unit to be certified to FSC. The State is currently evaluating the value-added of FSC and whether to include additional planning units to the SPS FSC certificate. DNR is not a member of FSC as such there is no requirement to have all their lands FSC certified.

The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy for Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government. An NC has been raised at certification decision level based on this conflict with law and FSC requirements not fixed yet.

No other non-conformances were identified against this principle

PRINCIPLE 2: Tenure and use rights and responsibilities

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

Each timber sale is reviewed by the public for input, including from affected indigenous peoples. Meetings are held with local tribes to discuss upcoming activities. The state archeologist works with local tribes prior to setting up a timber sale if it is suspected a cultural resource may be present.

No non-conformances were identified against this principle

PRINCIPLE 3: Indigenous Peoples' Rights

Washington DNR maintains government-to-government relations with the 13 federally-recognized Indian

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

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

WDNR has a tribal relations program that includes annual summit meetings inviting all federal and non-federal recognized tribes within the State of Washington. The WDNR has a very strong relationship with aboriginal peoples.

No non-conformances were identified against this principle

PRINCIPLE 4: Community relations and worker's rights

WDNR is a public agency and a responsible employer. Its policies meet or exceed the legislative requirements in labor relations, public health and safety, and public procurement. The WDNR follows State Labor and Industry Laws to focus on worker (and contractor) safety. WDNR 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". Through its policies and legislation the State meets the intent of the ILO labour accords. Most WDNR employees are covered by a public service collective bargaining agreement, which ensures a fair rate of compensation. The compensation survey shows the agency is slightly below what is paid by federal agencies and private companies, but this is offset somewhat by the added benefits.

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

There are a number of volunteer organisations operating on the forest who work with WDNR to develop promote and manage recreational resources. Auditors met with members of the Friends of Woodward Bay and Quadra Paws. Both groups were very complimentary of WDNR and the great support and assistance they get from the department.



Figure 1. Woodward Bay NCRA

A review of the civil penalties list and the forest practices list provided evidence of WDNRs commitment to regulatory compliance. The agency is only listed twice for notices to comply, and only minor issues.

No non-conformances were identified against this principle

PRINCIPLE 5: Benefits from the Forest

The South Puget HCP Planning Unit is a significant contributor to the economy with average annual timber revenues of approximately \$13 million and leasing revenues of nearly \$1 million. WDNR does not permit export of logs, which reinforces the local economy and favors local processors. 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.

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 trees (Figure 2).



Figure 2. The Now & Later site efficiently harvested and promptly regenerated

The Resource Management Cost Account (RMCA) funds WDNR's Land Management activities on state trust lands. WDNR deposits a portion of the revenue it generates from these lands into the account, and the legislature appropriates funds from the account to WDNR for expenditures. The RMCA can be used only for land management expenses (e.g., reforestation, preparing timber sales, or managing aquatic leases) that support federally granted state lands

Most timber is sold as stumpage with the buyer merchandising standing timber. Some small direct sales are available to smaller contracts, which are specifically undertaken to encourage small business.

From field examination of 12 or more sites wood utilization was high. The only remaining fiber is sub-merchantable wood put into slash piles. There are a whole host of procedures and requirements which ensure that sites and resources are protected. Forest harvest sites are required to retain stand features through residual and DWD. Residual stems are painted and protected.

As the steward of state trust lands, WDNR actively plans recreation opportunities. Through extensive involvement from local recreation groups, WDNR volunteers, and the public, we take an integrated approach to providing fun and safe recreational opportunities on WDNR-managed lands. WDNR accomplishes this largely through the adoption of formalized recreation plans, which help to guide recreation on WDNR-managed lands for the next 10 to 15 years. This was discussed numerous times in the field where WDNR mitigated and adjusted the timber sales. The state protects water quality through its forest practices and riparian protection measures. The "Mountains to Sound Greenway" is a project to protect water quality in the Seattle/Tacoma metro area.



Figure 3. A trail feature developed for aggressive trail use.

Average Annual Harvests are developed for sustainable harvest units (a subset of the FMU). They are assessed every 10 years and incorporate a range of data and assumptions with regards to land availability, A new harvest assessment is in the final stages of its environmental review and will be implemented in 2018 or 2019. This new analysis in support of the AAC has been developed using a new forest inventory and planimetric data. Over the past 10 years the AAC for South Puget was 194,940 m³ while the harvest was 197,623 m³ a difference of less than 1%. The harvest on the forest in 2017 was 233,764 m³ (45,836 MMBF) which is approximately 117% of the current AAC, this is in line with the management plan and is the result of selling stumpage where the purchaser can determine when to harvest within a 24 month term. Timber volumes harvested do not exceed annual growth.

The Habitat Conservation Plan has desired forest condition which the FMU is moving toward. Harvests tend to target poor productivity stands. The audit team saw evidence of stand improvement activities and land

remediation during the audit. Innovative methods to create foraging and dispersal habitat for northern spotted owls were seen. The audit team appreciates the amount of thought that goes into developing site specific prescriptions to enhance habitat based on existing stand characteristics. WDNR is constantly developing new methods to achieve a desired forest condition

The state permits harvesting of salal and boughs on an area basis. They track removals in a variety of measures depending on the product

No non-conformances were identified against this principle.

PRINCIPLE 6: Environmental Impact

The South Puget HCP Planning Unit has an Environmental Impact Statement (2010) (EIS) which is reviewed every ten years. Annual reports on HCP(2016 reviewed) address progress towards conservation objectives (Riparian Habitat, Spotted Owl, Marbled murrelet) adaptive management, silvicultural activities, roads management, land transaction, non-timber management activity, recreational program). The EIS was subject to public review prior to initial approval. The HCP, EIS and Annual reports are available online.

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

Harvest prescriptions include direction for leave tree retention, soil impact management, and riparian management zones. Habitat features for rare, threatened or endangered species are applied at both the strategic level and in the detailed harvest preparation. Innovative methods to create foraging and dispersal habitat for northern spotted owls are being applied. A lot of thought goes into developing site specific prescriptions to enhance habitat based on existing stand characteristics, and developing new methods to achieve a desired forest condition.

The WA DNR SPS Planning Unit is under a Habitat Conservation Plan (HCP) where credible assessments have been made on each of the items. In addition, a SEPA checklist is completed for each timber sale that is proposed. Each item has to be addressed in the SEPA checklist. The Forest Practices Application (FPA) also addresses several of the items when applying for a harvest permit

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

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

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

There is a considerable effort to promote habitat for RTE species. Suitable for potential habitat has been identified. Harvest prescriptions are made based on current stand conditions, and the desired future condition to enhance foraging and dispersal habitat. The objective of the HCP is to provide NSO dispersal

habitat between suitable nesting habitat on adjacent federal lands. The HCP is also designed to encourage recovery of listed anadromous fish species and the marbled murrelet.

The Natural Heritage Plan identifies species that may be rare or threatened. The Forestry Handbook is an assembly of procedures that guide management of resources when rare species or plant community types are observed. One timber sale was reviewed where plant communities identified through the Heritage system led to revised harvest prescriptions and documented through the P & T process,

A Westside Old Growth Habitat Index (WOGHI) is completed when there is a moderate to high likelihood of old growth on a timber sale. The WOGHI is a screening tool to help identify potential old growth that then needs to be field verified. Every timber sale is screened for presence of old-growth stand structure and age, and for presence of pre-euro-American settlement trees. If potential old-growth forest is identified, a specially trained "old-growth designee" visits to the site to assess the areas. SPS regional office staff know where there is old-growth and have polygons developed.

The Riparian Restoration Strategy is implemented through the procedure that guides land managers in typing streams and wetlands and creates guidelines for buffers on varying water types. The management goal of the riparian forest restoration strategy is to contribute to the conservation of other aquatic and riparian obligate species and to restore structurally complex riparian forests

Uncommon habitat is one of the attributes identified to raise habitat to a featured status. Snags, legacy trees, and large down woody debris (LDWD) are routinely left on all harvest areas. WDNR retains a minimum of 20 trees per hectare (8 trees per acre) in addition to 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 (20+ per hectare), as well as, peninsular leave areas and riparian areas where all vegetation remained.

Within unit retention levels, landscape retention levels and rotation age all combine with unit size to achieve ecological objectives, according to forest ecologists, and the combination of those can be varied according to the landscape objective. Regeneration harvest blocks in even-aged stands average 40 acres or less. However, some individual harvest blocks exceed 60 acres. The HCP, which was developed by a qualified team of experts, allows harvest blocks up to 100 acres. Clumped and dispersed leave trees are required to be left. Most units are under 40 acres and contain wetland protection and/or riparian leave tree areas. In rare occasions, these riparian function areas are not available and unit sizes may exceed 60 acres

Field staff undertake noxious weed control as budgets allow, working cooperatively with counties and other groups. They work cooperatively with a number of counties in dealing with noxious weeds. The auditors viewed several planted areas where scotch broom (*Cytisus scoparius*) was present, both in the blocks and in the roadways into the blocks. Several different techniques are used to limit the impact of the invasive species on forest stands (e.g. herbicide application, pulling and slashing). Overall, the control efforts seemed to have a transient impact. It is largely ineffective in terms of preventing or controlling scotch broom. WDNR seems not to have the tools available to prevent or control this invasive species.



Observation: The Department should consider a more extensive monitoring program that documents the extent of Scotch broom on WDNR lands and the impacts it may be having on stand dynamic (6.3.h)

On a majority of harvest sites, the predominate native tree species is Douglas-fir which require openings for regeneration and 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. WDNR Forest Practices Act has a “green up” size and designation for regeneration size and adjacent areas.

All roads are generally surfaced and are subject to restricted use during extremely wet weather where damage can occur to the road sub-grade. 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. Surfaced roads are water-barred and generally barricaded. Most roads are gated and access is restricted for all or part of the year. Designated roads are open to the public for recreation and hunting.

The Washington Forest Practices Act regulations with regards to water quality and water bodies exceed those of the FSC US Forest Management standard. The WDNR 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 has undertaken their removal or replacement.

WDNR undertakes some ground and hand herbicide applications on a small percentage of the ownership. Herbicides are used to either prepare sites for regeneration or to release trees from vegetative competition. WDNR 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. None of the chemicals used by WDNR was from the FSC list of highly hazardous chemicals. An integrated pest management approach was evident, with chemical pesticides used only after no treatment and non-chemical treatment options are considered.

No non-conformances were identified against this principle

PRINCIPLE 7: Management Plan

The South Puget HCP Planning Unit is the first Planning Unit to develop a Forest Land Plan. The current

plan was approved in 2010 after a five-year development, review and approval process. 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 plan is available in its entirety from the WDNR website.

The Forest Land Planning Policy describes WDNR'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). The plan contains qualitative and quantitative descriptions of the current and historical forest conditions.

It is a requirement that all loggers are state trained to be able to bid. Loggers are also required to meet the forester on site to discuss the operations and prescription

No non-conformances were identified against this principle.

PRINCIPLE 8: Monitoring and Assessment

Washington DNR has a robust system for monitoring activities, resources and forest conditions. A new forest inventory has been prepared for use in the upcoming allowable cut calculation and the new forest management plan. Forest operations are monitored through the Planning and Tracking system which is a repository for all management information for a particular stand or site.

The WDNR monitors rare threatened and endangered (RTE) species through the Habitat Conservation Plan which is directed at 8 key RTE species. The planning & tracking system has reporting capability to cover these items. The implementation monitoring program covers most of the items. Set asides and buffers are monitored through the harvest monitoring program.

DNR surveyed its road system to identify roads in need of maintenance or abandonment. All maintenance and abandonment work was completed by 2016, which was the deadline agreed upon by DNR, the Department of Fish and Wildlife, the Department of Ecology, and affected tribes. Foresters monitor all road segments, particularly those that are prone or have high risk of failure during large weather events.

Various monitoring systems are in place to evaluate the implementation and effectiveness of its management activities. The P&T database contains all the information for each stand within the FMU. The P&T report records salvage and other unexpected removals. Past events for each stand are recorded, including any removals due to catastrophic events. Natural areas are monitored with results recorded. The P&T report records stands with invasive species, specifying the type of invasive, and if it has been treated. Harvest activities are monitored with results recorded on a harvest inspection form. The agency wildlife biologists monitor the results of harvests to ensure it meets NSO requirements.

The State operates a robust chain of custody system for its timber. This includes special load tickets and contract specifications. During the audit it was found that the reference to FSC certification and certified wood appears deep within the agreement and did not clearly identify the units which were certified.:

Observation: The agency should change the language in G115 of the harvesting contract to ensure the units considered as FSC certified are more clearly identified.

The agency monitors the economic impacts through its economic and revenue forecast and forest land plan. The employee engagement survey provides monitoring of the creation of quality job opportunities. A summary of direct sales tracts the number of sales to local constituents. Non-timber forest products are also tracked, which goes to locals

The stakeholder process is documented and implemented through the SEPA process. There is an appeals process. Complaints are documented and response is immediate.

No non-conformances were identified against this principle

PRINCIPLE 9: Maintenance of high conservation value forests

A well developed program is in place to monitor HCV attributes and corrective actions available if in fact, monitoring results indicate an adjustment is required to better maintain or enhance the attribute. The Services are very involved in the monitoring process and will follow-up if adjustments are required. Compliance and effectiveness monitoring exists and is robust for HCVFs. e.g, Northern Spotted Owl and Marbled Murrelet on the HCP. In NRCAs and NAPs, monitoring program objectives and standards are described. WDNR personnel and cooperators visit sites frequently to monitor the sites and activities.

The Natural Areas Preserve Act (RCW 79.70) and other planning efforts such as the HCP allow DNR to purchase lands for conservation reserves. WDNR maintains a GIS database that includes, for example, Old growth, natural heritage, and cultural resources. All staff have access to information in the GIS database. Candidate HCVs can be identified internally or externally by stakeholders. HCVs fall into several categories including designated NRCA and NAP; old growth communities, endangered species and rare plant communities. HCVs cover several thousand hectares across the SPS certified forest. DNR staff can also use the weighted old growth habitat index tool to identify the probability of where old growth might be found (approx. 2007). It was confirmed there is no confirmed old growth on DNR trust lands in SPS.

A multi-disciplinary team of WDNR foresters, biologists, and natural heritage scientists are used to develop the assessment process of HCVs. A public input process is in place through SEPA and the Forest Practices application process. Auditors interviewed members of "Friends of Woodard Bay" a volunteer group that assists with the management and maintenance of Woodard Bay Natural Resource Conservation Area.

Management plans are in place for all HCVs, be they NRCA, NAP, habitat components of the HCP or other designations. Specific direction is provided with respect to permitted uses and activities. A review of the documents and interviews with DNR confirm any prescribed or proposed activities are designed to maintain or enhance HCVF attributes. Uses can vary widely and depend on the values being protected or enhanced. Auditors visited Woodard Bay Conservation Reserve and heard from volunteers how their work meets the intent of this Indicator. WDNR has a long standing and active program to purchase adjacent HCVF lands from private owners through a grants program. Potential land purchases are prioritized according to HCVF attributes. Auditors heard of two land transactions which were near finalization and would add area to the Woodard Bay NRCA.

No non-conformances were identified against this principle

PRINCIPLE 10: Plantations

Not Applicable

Forests are of native species and on long rotations (80 years +) and not considered plantations as per the FSC US Forest Management Standard

NOTE: To be updated with the revised FSC STD 01 001 (Version 5.1.).

9.2 - Elements subjects to controversy

None identified

10 - Result regarding the correction of previous Non-Conformities (NC)

10.1 Non Conformities

n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non- conformities	Closure date
!	8.1.a	MAJOR	Dec 10 2012	Prepare a "written monitoring protocol" for the implementation-monitoring program	Lack of written monitoring protocol	Dec 10 2012	Closed	Prepared a "written monitoring protocol" for the implementation-monitoring program.	24 October 2013
2	6.7.a	MINOR	Dec 10 2012	The operator (logging contractor) did not have an oil spill kit on site as required in the Timber Sales Contract and Logging Plan of Operations.	On site inspection, as one of several loggers and as the logging equipment was in excellent report this was classified as minor	Dec 10 2012	Closed	Short-Term: The operator was immediately notified that the operation was shut-down at the end of the day and could not resume until three spill kits, one for each piece of equipment, were confirmed to be on-site by the Contract Administrator. Long-Term: The WDNR verifies by physical inspection that all spill kits required in the contract are on site prior to commencement of operations and documents on a site inspection form.	24 October 2013
3	4.2.b	Timber Sale Contracts (both Stumpage and Contract Harvest) do not include specific safety	24 Oct 2013	As evidenced by the contract templates both the stumpage and contract harvestig	This is considered a minor deviation as contracts do specify compliance with all applicable requirements and silviculture contracts include written safety requirements.	Oct 23 2014	Closed	Revised contract templates were provided by WDNR	Oct 22 2014

n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non-conformities	Closure date
		requirements.							
4	8.2.b	Minor, this NC became a major NC on the 22th of October, before the closure on the next surveillance audit, because at the deadline for the closure the evidences were not available	23 Oct 2014	Forest Products are being harvested including conifer boughs and Salal, contracts specify the price and area. Data on volumes harvested were not provided during the audit.	This is a small amount of volume harvested that has a very remote possibility of having an impact of sustainability of the resource. This was deemed to be an administrative deficiency and therefore rendered a minor non-conformance.	Oct 22 2015	closed	WDNR has created a data base that tracks the non-timber forest products harvested by year, by lessee and by location. In 2014, a total of 812,244 bunches were harvested across three forest units. An additional 365,000 bunches had been collected in 2015 at the time of the audit. WDNR has met the requirements of the indicator, and the non-conformance has been closed. This was not closed prior to the one year deadline as the on-site audit, when the evidence was presented and confirmed, was not scheduled until 10 days past the deadline. It was closed on the initial date of the audit	2 Nov 2015
5	40-004 6.1.2	Major	23 Oct 2014	Load tickets for the timber harvested use the claim FSC PURE Rather than the proper claim of FSC 100%	This was the second NCR issued against this indicator , therefore it was raised to a major .	Jan 22 2015	Closed	Non-conformance 05 above was closed on January 20, 2015 based upon the presentation of evidence that the load	Jan 20 2015
6	6.6 b	MINOR	5/11/15	The WDNR IVM strategy addresses the requirements to demonstrate consideration of non-chemical alternatives and that, when chemicals are used, the least environmentally damaging formulation and application method is used. However, the written strategy does not include language that addresses the requirement to establish a	Was classed as minor as it is a policy commitment which does not directly affect sustainability or the use of forest chemicals	4/11/16	CLOSED	Reviewed revised strategy and training materials used with staff	17/10/16

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n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non- conformities	Closure date
				goal of reducing or eliminating chemical use whenever feasible.					

10.2 Result regarding the resolution of complaints

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

11 - Records of Non-conformities and observations

11.1 - Records of Non-Conformities

None Issued

n°	Indicator	Status	Date recorded	Text of the NC or PUAR	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	Closure evidence	Closure date
1	1.6.a	Minor	9/04/18	The State of Washington is unable to sign the current Policy of Association Declaration (FSC-POL-01-004) due to conflicts with their legislative mandate and constitutional rule of law.	Lack of a signed Policy of Association Declaration. The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy of Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government. Rated as a minor by the technical reviewer as it's	9/04/19		

					clearly a conflict between the law and the requirement of FSC.			
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11.2 - Records of complaints (if relevant) – None Received

Stakeholders reference (name / organisation / type)	Date	Received complaints	FSC criteria-indicator	Checked on site? (YES or NO)	Answer (+Date)		
					Client	lead auditor	Bureau Veritas Certification

11.3 - Records of observations

n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence
1	Oct 31/17	The Department should consider a more extensive monitoring program that documents the extent of Scotch broom on WDNR lands and the impacts it may be having on stand dynamic (6.3.h)	Scotch broom observed at several field sites. The observation refers to 1 of 4 elements within this indicator. Currently, monitoring occurs during planning and onsite operations. The observation is meant to suggest a broader more pro-active monitoring. It must be realized that scotch broom is now endemic in Washington and can not be eradicated as it is found through out the state and control can only be achieved with heavy annual herbicide treatments
2	Oct 31 17	The agency should change the language in G115 of the harvesting contract to ensure the units considered as FSC certified are identified (8.3.a)	Logging contract template

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12 - Proposals regarding the certification decision

12.1 - 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 initial 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.

The indices defined in the checklist, must be considered as guidance to the auditors.

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

Based upon the very positive findings of this audit the audit team recommends that the FSC certificate for the South Puget Sound HCP forest management unit be re-issued for a further five years.

13 - Certification decision

The HUB decides that the FSC FM certificate of Washington can be re-issued. The minor NC 1 shall be closed by the 9th of April 2019.

Issued December 13 2017, reviewed the 12/04/2018.

FM certification technical manager,

Lead Auditor,

Eglantine Goux-Cottin



Brian Callaghan

14 - Appendices

- A. CV of the members of the audit team *auditor expertise (3.2.1. FSC STD 20 007a)*
- B. Checklist(s)
- C. Other documents provided by the applicant
- D. Stakeholder Spreadsheet

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**FSC Forest Management Certification
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