

To: Lenny Young, FP Division Manager

From: Gary Graves, FP Assistant Division Manager - Operations

RE: Final Olympic Region Audit Team Report

Date: May 8, 2006

First, I would like to thank the staff in Olympic Region for creating an environment that allowed us to openly discuss and explore your current methodology of implementing the forest practice program in the region.

Findings:

- ☺ The forest practice staff members were very helpful in answering or attempting to answer supplemental questions the audit team had during site review.
- ☺ Most FPAs were approved within the time limits allowed by the rules. One was approved beyond the time limit by one day and another FPA could not be determined when, if at all, it was approved.
- ☺ The forest practice staff is aware of how to handle sensitive information but they believe it would be helpful to have written guidance.
- ☺ Most landowners are identifying PIPs by locating them on the landscape rather than using the default basin size.
- ☺ The region is generally attempting to implement the forest practices rule as written. Reforestation receives little attention but appears to be adequate in the region.

- ☹ Of the 20 FPAs reviewed, 16 were not complete when approved.
- ☹ Half of the FPAs were classed correctly, (10 out of 20). One FPA jacket didn't contain an application so a determination couldn't be made.
- ☹ The review showed that 19 of the 20 FPAs should have had a pre-approval site visit to validate the information presented in the application. The audit team found documentation in 6 applications that a site review had occurred.
- ☹ The region forest practice office reviewed over 250 applications but only found three applications that contained documentation of an ID Team visit. Region has no system in place to track ID Teams when they occur. The audit team couldn't determine the number of essential team members associated with the ID Teams in two of the three FPAs files.
- ☹ Half of the FPAs were conditioned appropriately to protect public resources while remaining FPAs were not for the various reasons.
- ☹ The forest practice foresters provided documentation that two of the twenty FPAs had received a post approval site visit.
- ☹ The region issued one civil penalty, which occurred in a timely manner, but the calculation process was not appropriately applied.
- ☹ The audit team could not find any evidence that the required meeting between landowner and affected tribes on the forest practice applications containing cultural resources had occurred.

- ☞ The audit team could only validate that one of the RMAPs reviewed met the even flow concept.
- ☞ The region used the appropriate enforcement actions in the majority of documents reviewed. Three documents were good examples of correctly identifying the issues and next steps. Most of the enforcement actions were not preceded by the required ICNs documents. Several of NTCs and SWOs identified work to be completed with due dates but no follow up documentation confirmed that the work had been completed at all or to DNR expectations.
- ☞ Documentation is lacking in all elements of the implementation of the forest practice program in the region.
- ☞ The forest practices foresters all confirmed that the region's requirement was to document all site visits in their personal diaries. Yet only one forester provided the information to confirm site visits had occurred.
- ☞ The region's forest practice office staff does not have an understanding of what information is needed in a completed application and the minimum acceptance standard for the FPAs.
- ☞ The FP Coordinator, who is responsible for managing the processing of FPAs, has been only reviewing Class IV FPAs or applications when the office staff has specific questions.
- ☞ The region is not implementing and/or enforcing the requirements of WAC 222-30-021(1). This requires landowners to leave those trees within the core zone if they do not meet DFC requirement.
- ☞ There is some confusion in the region of what is an "official ID Team Meeting" verses an informal site review with TFW participants.
- ☞ The region forest practices management has not shared the region deliverables in their entirety to the FPFs. This has caused the foresters to not have a clear understanding of the expectations set forth in them.
- ☞ The region needs to establish a standard practice to document all activities associated with each FPA. This information needs to be retrievable from the office files of individual applications by interested staff.
- ☞ Some foresters took enforcement action only when they could determine resource(s) damage had happened or had the potential to occur.
- ☞ The region staff believes the program should have a system to track leave areas associated with FPAs and that a GIS layer would likely be the most useful method.
- ☞ The FP DM described a compliance allocation system of checks and balances for his field staff but most of the field staff told the audit team that it was left to them to devise a system that suited there needs.
- ☞ There is a huge communication gap or blockage that is centered around the RP&S & FPDM positions. This message was repeated in nearly every interview with staff.
- ☞ FP DM doesn't follow the Enforcement Handbook.
- ☞ FP Coordinator spends a high percentage of his time assisting the forest practice foresters to determine the appropriate understanding of the rules and how to implement them in the field rather than managing the office.