FSC CERTIFICATION SYSTEM

Recertification PUBLIC REPORT

FOREST MANAGEMENT CERTIFICATION

Last report update: 30 March 2015

Washington State Department of Natural Resources South Puget HCP Planning Unit

Forest location(s): USA, Pacific Coast,

Manager office address: 1111 Washington St. SE, Box 47016 Postal code: 98504 - Town: Olympia, Washington - Country: USA

Contact Person: Lislie Sayers (lislie.sayers@dnr.wa.gov)

BUREAU VERITAS CERTIFICATION

60 avenue du Général de Gaulle - 92046 Paris - La Défense Cedex - FRANCE Tel: + 33 1 41 97 02 05 - Fax: + 33 1 41 97 02 04 www.certification.bureauveritas.com / fr

Contact Person for North America Melani Potts (melani.Potts@us.bureauveritas.com)
* For Lead auditor information, please refer to main audit / annual surveillance audit report

Renewal audit date: December 10 – 14, 2012 Last surveillance audit date: October 20 – 23, 2014

Certificate registration code: BV-FM/COC-080501

Certification date: May 15, 2008

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1 - Summary

The Washington Department of Natural Resources' (WDNR) South Puget HCP Planning Unit underwent a recertification audit of their FSC forest management certificate (BV-FM/COC-080501). The audit was undertaken by a three-person audit team, who were onsite from December 10th to 14th 2012. The auditors evaluated conformity against all criteria and indicators in the FSCUS Forest Management Standard (v1.0). Auditors visited 32 field sites covering a range of forest conditions and operations.

2 - Legislative, administrative and statutory context

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

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

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

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

3 - Description of forest management

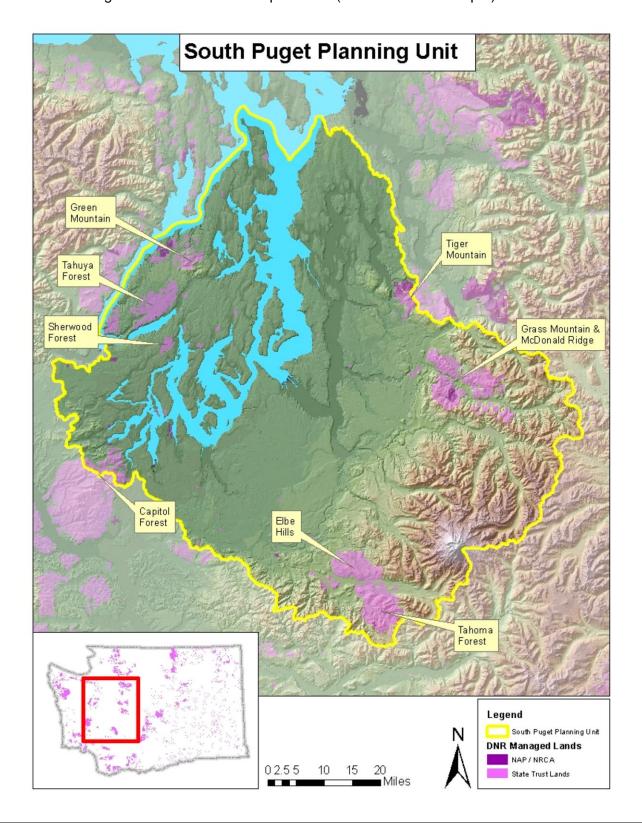
3.1 - Description of the forest, its history and regional context

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.

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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 159,820acres (64,676 hectares) of DNR-managed forested state trust lands, which are organized into nine landscape blocks (shaded areas of Map 1).



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3.1.1 - General description and identification

a) Certificate holder name: Washington State Department of Natural Resource
 Name of the forestry management body / managers: Washington State
 Department of Natural Resource

Address: 1111 Washington St. SE, Box 47014

Postal code: 98504

Town: Olympia, Washington

Country: USA

Legal status: government agency Legal Identification code: code Telephone: 360-902-2896

Fax: 360-902-1789

e-mail: <u>lislie.sayers@dnr.wa.gov</u>
Web site: www.dnr.wa.gov

Employees number: 1,369 (statewide), 78 (on the FMU)

Annual turnover: \$362,598,000 (state-wide), \$13,000,000 (annual average on

the FMU)

Commissioner of Public Lands: Mr. Peter Goldmark

Manager of the Forest Management company: Ms. Julie Sackett Contact person (responsible for FSC certification): Ms. Lislie Sayers

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

Type: forest management

Detailed activity: The Washington State Department of Natural Resources 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), 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.

As already stated, the WDNR manages state lands in trust for a number of public entities. This is a fiduciary relationship, which requires that WDNR

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manage its forest lands to optimize the economic value to the trusts, with undivided loyalty. The relationship does not in any way relieve the agency from abiding by the HCP, Federal and State Laws, and the Forest Practices Act. The balance of fiduciary, environmental and economic goals are determined by the Board of Natural Resources (BNR) and the beneficiaries.

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

b) Forest owner name: The State of Washington

Address: 1111 Washington St. SE

Postal code: 98504

Town: Olympia, Washington

Country: USA

Legal status: government agency Legal Identification code: code Telephone: 360-902-2896

Fax: 360-902-1789

e-mail: <u>lislie.sayers@dnr.wa.gov</u> Web site: <u>www.dnr.wa.gov</u>

Employees number: 1,369 (state-wide), 78 (on the FMU)

Annual turnover: \$362,598,000 (state-wide), \$13,000,000 (annual average on

the FMU)

Detailed activity: Multiple Use Land Management

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

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

c) Description of legal ownership and usages applicable to forests and land constituting part of the auditor's field of applicable(coverage)

Summary of legal ownership of the organisation in question: State-owned public trust lands

Summary of legal ownership and customary right (legal and traditional) of the various parties other than the applicant organisation: none

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Summary of non forestry activities carried out in the evaluated forest be they undertaken by the certified organisation or any other party:

A range of activities occur on the FMU. Several types of Non-timber Forest Products are harvested including tree boughs and salal both of which are used as greenery by floral display industry. The lands managed by the department are open to public recreation, which includes hiking, biking, cross-country skiing and horseback riding. Many activities are supported and coordinated by local volunteers who maintain the various trail and structures

d) Other activities

Description of the activities

None

Potential Impact on forestry

None

3.1.2 - Description of forest stand

a) Forest(s) description

Type of forest: temperate

List of main wood species, particularly commercialised species and other species integrated in the field of application or coverage of the certificate (botanical and common name):

FSC REF	Commercial Name	Scientific Name
13	Douglas Fir	Psuedotsuga menziesii
9b	Red Alder	Alnus rubra
12	Western Red cedar	Thuja plicata
4a	Western Hemlock	Tsuga heterophylla
1	Pacific Silver Fir	Abies amabilis
2	Bigleaf Maple	Acre macrophyllum
275	Cottonwood	Populus trichocarpa
1	Noble Fir	Abies procera
6	Spruce	Picea spp.
	Lodgepole Pine	Pinus contorta
	Western White	
	Pine	Pinus monticola

Dominating forest stand composition: softwood

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Location of the forest:

Latitude E/W: 47 degrees 13 minutes

Longitude N/S: 122 degrees 28 minutes

Total audited forest area: 64,676 ha (159,820 ac), which is:

- privately managed: 0 ha

state managed: 64,676 ha (159,820 ac)

community managed: 0 ha

- timber production forest: 64,676 ha (159,820 ac)

classified as "plantation": 0 ha

- regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems: 753 ha (1,861ac) /year
- regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems: 0 ha
- forest and non-forest land protected from commercial harvesting of timber and managed primarily for
 - conservation objectives: 4,364 ha (10,784 ac.)
 - the production of NTFPs or services: Lease Area 26,219 ha (64,789 ac)
- forest classified as "high conservation value forest": 31,652 ha (78,100 ac) (HCP affected areas)

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

- b) List of high conservation values present: The South Puget HCP Planning Unit FMU has more than 31,000 ha classified as HCVs accounting for approximately 50% of the landbase. The rich ecosystems of this region support a number of RTE species such as Northern Spotted Owl and Marbled Murrelet whose habitat must be protected. The state has designated a number of old growth Forest sites along with some uncommon features and habitats for protection.
 - **HVC 1**: Northern Spotted Owl Habitat, Marbled Murrelet Habitat, Salmonoccupied Rivers, Bald Eagle Habitat, Peregrine Falcon Habitat, Gray Wolf Habitat, Aleutian Canada Goose Habitat

HVC 2: Old growth forests

HVC 3: Uncommon habitats including; balds, cliffs, caves, talus, oak woodlands, mineral springs, snags and structurally unique trees. Riparian and wetland areas containing rare plants and communities

HVC 4: N/A

HVC 5: N/A

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HVC 6: N/A

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

Herbicides Employed: Triclopyr, Glyphosate, Imazapyr, Sulfometuron, Clopyralid

Rationale for Use: all herbicides are used for site preparation and vegetation control in regenerating sites (both before and after tree planting).

d) List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products:

Species	Produced quantity (MBF)	M^3	Product nature	Selling mode	FSC type
Cottonwood	389	1,995	Roundwood	Stumpage/Contract	FSC 100%
Douglas Fir	16,880	86,565	Roundwood	Stumpage/Contract	FSC 100%
Western Hemlock	6,398	32,811	Roundwood	Stumpage/Contract	FSC 100%
Lodgepole Pine	606	3,108	Roundwood	Stumpage/Contract	FSC 100%
Big Leaf Maple	75	385	Roundwood	Stumpage/Contract	FSC 100%
Noble Fir	313	1,605	Roundwood	Stumpage/Contract	FSC 100%
Red alder	1,421	7,287	Roundwood	Stumpage/Contract	FSC 100%
Western Red Cedar	455	2,333	Roundwood	Stumpage/Contract	FSC 100%
Pacific Silver Fir	156	800	Roundwood	Stumpage/Contract	FSC 100%
Spruce	17	87	Roundwood	Stumpage/Contract	FSC 100%
Utility Conifer	134	687	Roundwood	Stumpage/Contract	FSC 100%
Utility Hardwood	177	908	Roundwood	Stumpage/Contract	FSC 100%
Western White Pine	132	677	Roundwood	Stumpage/Contract	FSC 100%
Grand Fir	0	0	Roundwood	Stumpage/Contract	FSC 100%
Total	27,153	139,247			

3.1.3 - Type of candidature for certification

Type of certificate: Single FMU

Total number of FMUs in the certificate scope: 1 Number of FMUs and forest area in scope that are:

less than 100 ha: 0 FMU that is 000 ha; from 100 to 1000 ha: 0 FMU that is 000 ha; from 1000 to 10 000 ha: 0 FMU that is 000 ha;

more than 10 000 ha in area: 1 FMU that is 64,676 ha (159,820

ac);

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

3.2 - General description of the management system

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

Efficiency regards to the forest history:

The South Puget HCP Planning Unit is a conifer forest, as more than 90% of the forest area is in conifer dominated forest types. Douglas Fir types are the most prevalent accounting for 70% (45,212 ha) of the total forest area, while Western Hemlock types account for 14% of the forest area. Hardwood forests are primarily red alder and account for less than 7% of the forest area. As can be seen from the table below most forest are mixtures of species (dominant species listed first).

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Forest Types	Acres	Hectares
Douglas-fir / Bigleaf maple	7,772	3,145
Douglas-fir / Pacific silver fir	36	15
Douglas-fir / Red alder	22,638	9,161
Douglas-fir / Western hemlock	55,461	22,444
Douglas-fir / Western red cedar	4,794	1,940
Pacific silver fir / Western hemlock	4,110	1,663
Red alder / Bigleaf maple	2,208	894
Red alder / Douglas-fir	6,183	2,502
Red alder / Western hemlock	1,423	576
Western hemlock / Douglas-fir	14,839	6,005
Western hemlock / Pacific silver fir	4,794	1,940
Western hemlock / Red alder	2,500	1,012
Western hemlock / Western red cedar	1,405	569
No Data	31,655	12,810
Grand Total	159,820	64,676

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

The South Puget HCP Planning Unit is organized into nine landscape blocks, which represent contiguous forest areas spread throughout the Planning Unit. Seventy-eight local (region) WDNR State Lands staff are responsible for the onthe-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 forestland planning, forest inventory and GIS support. Policy development and research are developed by division staff and implemented by region staff while training is coordinated and delivered by main office personnel (division staff) so it is consistent across the State.

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

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

3.2.1 - Management principle:

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

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.

3.2.2 - Putting in place and management objectives:

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 health care throughout the state.

3.3 - Summary of the management plan

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

- > minimize the extent of the road network and its environmental impacts
- achieve restoration of high quality aquatic habitat to aid in federally listed salmon species recovery efforts, and to contribute to the conservation of other aquatic and riparian obligate (dependent) species
- ensure perpetual revenues to the trusts
- identify and offer a mix of special forest products to take advantage of existing markets and market value fluctuations based upon the condition of the forest understory
- improve the value of trust lands, increase their income potential, and reduce financial risks to the trusts by diversifying the land base, both among and within each asset class
- actively manage towards structurally complex forest condition especially those suitable stands in the 'biomass accumulation' forest development

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stage, to achieve older-forest structures across 10 to15 percent of each Western Washington HCP Planning Unit within 70 to 100 years.

3.3.1 - Elaboration and validation of development plans

Annual work plans and budgets are developed to schedule activities on the forest management unit. All activities are recorded and tracked in the Department's Planning & Tracking system. Annual work plans confirm the general prescriptions set out in the management plan and refine them into work instructions with detailed measures of success such as residual trees per acre, and number of seedlings to be planted. Annual plans are developed by local staff in the regions and approved by divisional staff in Headquarters. Prescriptions for all management activities are verified on-site for applicability and correctness by a WDNR staff.

3.3.2 - Management structures put in place by the certified organisation.

WDNR is organized hierarchically with headquarters being responsible for setting policy, developing program direction, carrying out forest inventory, and leading land management planning. The Planning Units (or regions) being responsible for silvicultural prescriptions, sale administration, compliance monitoring, and contracting operations. Staff in each region undertake the day to day planning, implementation, and monitoring of forestry operations.

3.4 - Monitoring and control procedures put in place by the certificate holder

The Washington Department of Natural Resources has an extensive set of monitoring programs that are applied across the forest management unit. This includes:

- Preharvest surveys
- Operational monitoring
- Survival assessments
- Stocking assessments
- HCP Implementation monitoring
- Old growth surveys
- Habitat assessments
- Recreational use assessments
- > Conservation area assessments

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).

3.5 - Potential excluded area

The South Puget Sound planning unit is one of nine planning units managed by the Washington Department of Natural Resources. The State has responsibility for managing approximately 1.2 million hectares (3 million acres) of state trust

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lands, which are divided into nine planning units. The development of management plans in Washington State takes approximately 7 years owing to the extensive analyses and public consultation that are required. The South Puget plan is complete and the forest is certified. The plan for the Olympic Experimental Forest is underway and as economies improve and funding is available plans will be developed in each of the planning units, which will then lead to their certification.

The 2010 strategic plan for the Department has as one of its objectives to "Increase the amount of land with Forest Stewardship Council (FSC) certification and increase the revenues received by the state and other landowners for FSC-certified timber products". Over the past four years the State has had trouble moving forward with certification of its other planning units owing to the downturn in the economy and the need to maintain trust funding for education and health has resulted in a slowing of plan development,

Given the States strong forest practices code, its binding Habitat Conservation Plans and its Sustainable Forest Initiative certification for the forest resources' on these uncertified planning units there is no evidence that any of the FSC Principles and Criteria are being violated on the lands not yet certified to the FSC standard.

4 - Standard(s)

4.1 - Forest management referential(s) used during the audit(s)

During the audit, we referred to the checklist (ref. SF03 FSCUS FM v1.doc) extracted from the FSC US national forest management standard.

This last version was updated May 2010 and is available on the website www.FSCUS.org or on request to Bureau Veritas.

4.2 - Referential adaptation and stakeholders comments

No adaptation was necessary as the national standard was used.

A. Audit initial

5 - Base of evaluation

5.1 - Summary of the audit(s) process

The South Puget HCP Planning Unit was initially certified in May of 2008. The initial certification was delayed due to concerns raised by the BV certification committee over clear cut harvesting. Six minor CARs were issued against WDNR during the initial audit, all were classifies as minor. Two CARs were related to finalizing the Draft management plan and providing a public summary. One related to improving social impact assessment. Reducing average harvest block size was the object of a fourth CAR. The fifth CAR was directed at

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improving stocking in regenerated sites. The sixth CAR was to revise the SEPA Guidance Handbook's definition of rare species and rare plant communities. A major CAR was issued by the BVC certification committee with regards to clear cut harvesting, this CAR was closed prior to certification.

Throughout the certification term four surveillance audits were carried out which resulted in three minor corrective action requests related to sales documents not meeting chain of custody requirements, and HCP monitoring reports not being prepared in a timely fashion. All CARs were closed within the required timeframes.

5.2 - Composition of the audit team(s)

Lead auditor: - Brian Callaghan RPF EP(EMSLA), FSC FM

qualified lead auditor on behalf of Bureau Veritas

Certification.

Auditors: - Jim Colla EMSLA, FSC FM qualified auditor, Bureau

Veritas Certification employee.

- Greg Bassler, FSC FM qualified auditor on behalf of

Bureau Veritas Certification.

5.3 - Modalities for collecting information

5.3.1 - Description of the audit(s) program

An audit plan was provided to WDNR staff prior to the audit. Appendix C contains the detailed agendas. Sites were selected prior to and during the audit the audit by the lead auditor covering a range of operations and site conditions.

Date: December 10, 2012

Time		Activity	BVC Repr.	Company Repr.
09:00	AM	Opening Meeting	BC JC GB	LS & AE
09:30	AM	WDNR update	BC JC GB	LS & AE
10:00	AM	Review progress on outstanding CARs	BC JC GB	LS & AE
11:00	AM	Document Review Colla P1, P2, P3, P9	BC JC GB	LS & AE
		Bassler P4, P6		
		Callaghan P5, P7, P8,		
12:00	PM	Lunch	BC JC GB	LS & AE
01:00	PM	Document Review continued	BC JC GB	LS & AE
04:30	PM	Daily debrief	BC JC GB	LS & AE
05:00	PM	Depart site		

Date: December 11, 2012

Time	Activity	BVC	Company Repr.
		Repr.	

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Time		Activity	BVC Repr.	Company Repr.
08:30	AM	Arrive WDNR Offices	BC JC GB	LS & AE
09:00	AM	Document review continued	BC JC GB	LS & AE
04:30	PM	Debriefing	BC JC GB	LS & AE
05:00	PM	Depart		

Date: December 12, 2012

Time		Activity	BVC Repr.	Company Repr.
07:30	AM	Depart Olympia	BC JC GB	LS & AE
08:00	AM	Field Tour – Tahoma (group 1) - Tahuya (group 2)	BC JC GB	LS & AE
04:00	PM	Return Olympia	BC JC GB	LS & AE
04:30	PM	Daily Debrief	BC JC GB	LS & AE
05:00	PM	Depart		

Group 1 – Callaghan & Colla

Group 2 = Bassler

Date: December 13, 2012

Time		Activity	BVC Repr.	Company Repr.
07:30	AM	Depart Olympia	BC JC GB	LS & AE
08:00	AM	Field Tour – Capitol (group 1) - Elbe (group 2)	BC JC GB	LS & AE
04:00	PM	Return Olympia	BC JC GB	LS & AE
04:30	PM	Daily Debrief	BC JC GB	LS & AE
05:00	PM	Depart		

Group 1 – Callaghan

Group 2 = Colla & Bassler

Date: December 14, 2012

Time		Activity	BVC Repr.	Company Repr.
07:30	AM	Depart Olympia	BC JC GB	LS & AE
08:00	AM	Field Tour – Tiger (group 1) - Green Mountain (group 2)	BC JC GB	LS & AE
03:00	PM	Compile Findings (auditors rendezvous)	BC JC GB	LS & AE
03:30	PM	Closing Meeting	BC JC GB	LS & AE
04:00	PM	Depart (drop at SeaTac)		

Group 1 – Callaghan

Group 2 = Colla & Bassler

5.3.2 - Documentation review

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A complete list of documents reviewed during the audit is contained in Appendix A.

5.3.3 - Interviews of stakeholders encountered

Washington DNR Staff

Kyle Blum Deputy Supervisor for State Uplands

Julie Sackett Division Manager

Paul Bialkowsky Assistant Division Manager-Product Sales Section
Angus Brodie Assistant Division Manager-Data Stewardship Section
Clay Sprague Assistant Division Manager-HCP and Scientific

Consultation Section

Allen Estep Program Lead, PSF / Certification

Lislie Sayers Program Implementation Lead, Forest Certification

Bob Johnson Assistant Region Manager – State Lands

Mary McDonald Assistant Region Manager, State Lands – Asset

Management

Scott Sargent Black Hills District Manager
Don Melton Unit Forester – Capitol Forest
Rob Hoff Forester – Black Hills District

Dave Gufler Intensive Management Forester – Black Hills District
Chris Rasor Intensive Management Coordinator – PC Region

Noelle Nordstrom Biologist

Colin Robertson Contract Administrator
Art Tasker Region Manager

Dave Lorence Assistant Region Manager – State Lands
Doug McClelland Assistant Region Manager – State Lands

Dave Denis Forest Manager – Belfair Unit

Pat Halford Forester – Belfair Unit
Ted Keeley Forest Manager – Elbe Unit

Roslyn Hendricks Forester – Elbe Unit Eric Richardson Forester – Elbe Unit

Lee RoachForest Manager – Black Diamond UnitMike DaviesForest Manager – Hoodsport UnitTyler TraweekForest Manager – Snoqualmie UnitBrian WilliamsIntensive Management Coordinator

Alan Mainwaring Biologist

Loggers

Mr. Jerry Brindle, foreman and owner of Brindle Tech Logging

Mr. Tim Brown, logging contractor

Trust Beneficiary

Mr. Rod Fleck - Manager City of Forks

Thirteen Indian tribes were contacted prior to the audit by mail, none expressed and interest in the certification of state Trust Lands in Washington State,

All stakeholders interviewed expressed satisfaction with the consultation processes delivered by the WDNR.

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An interview with one contractor confirmed a good understanding of the site specific requirements for riparian and leave tree direction.

5.3.4 - Visit of sites (s)

During the audit 32 field sites were inspected by the auditors. Sites included areas which had been harvested, renewed, and/or tended. Additionally, one cultural heritage site, a new bridge installation, and several recreation sites were included in the site visits. A complete list of sites is provided in Appendix E.

5.4 - Stakeholders identification and consultation

Stakeholders were first identified prior to the re-certification audit (October 29, 2012), then prior to the initial audit (November 1, 2012) letters were sent to approximately 70 stakeholders.

A complete list of consulted stakeholders is available in Appendix D.

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

- Mr. Rod Fleck City of Forks Trust Beneficiary
- Mr. Matt Longenbaugh- NOAA National Marines Fisheries Service Mr. Longenbaugh clearly stated "Our agency is satisfied with performance of the HCP, including the South Puget Sound land management. Forest-land habitats for all the covered species of anadromous fishes under our agency's purview are being well conserved by the HCP." He did express some concerns over the Headwaters Conservation Program: "To my knowledge, there has been little action by WA-DNR on this matter since that time (2009)."

During this audit we interviewed the following:

Mr. Rod Fleck – City of Forks – Trust Beneficiary
 Mr. Fleck acknowledged how important the revenues from trust lands are to many communities throughout the State. He was concerned with the costs of FSC certification, especially in light of the fact that State does not get a premium for certified wood.

6 - Audit observations

6.1 - Main strengths and weaknesses

The Washington Department of Natural Resources forest and land management system, as it has been implemented over the past five years, ensures that all of the requirements of the FSC US Forest Management standard are met throughout the South Puget HCP Planning Unit.

WDNR has a very experienced compliment of staff who live and work in the communities with the forest management unit. The Department has maintained

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its core staffing throughout the past five years and has maintained the necessary professional staff to effectively manage their forest.

The department has among the best documented forest management systems. They operate an effective public planning system in an area of high public visibility. To ensure that operations are implemented appropriately and to gauge objective achievement a complete suite of monitoring systems are in place.

6.2 - Evaluation results in regards to the FSC referential

6.2.1 - Principle 1 - Compliance with laws and FSC Principles

WDNR is in compliance with all applicable laws and regulations. The Department carries out a variety of compliance monitoring activities, related to both the HCP and the State Forest Practices Act. 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 shown its commitment to FSC Principles and Criteria by maintaining their certificate over the past 5 years. WDNR has been a public proponent of FSC certification and has worked with regional groups and FSC national initiative to promote FSC.

No non-conformances were identified against this principle.

6.2.2 - Principle 2 - Tenures, 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. On individual timber sales, the parcel boundaries are established by a cadastral survey. Traditional uses (especially for aboriginal peoples) are respected through the Cultural Resources Policy of the agency. The State of Washington has entered into a variety of agreements with aboriginal peoples (e.g. tribes) to respect traditional use rights.

No non-conformances were identified against this principle.

6.2.3 - Principle 3 - Indigenous people's rights

Thirteen Indian tribes were contacted prior to the audit by mail, none of the tribes provided any inputs or voiced any concerns with the Department. WDNR does not operate on land under current Native American tribal control. WDNR undertakes cultural heritage surveys to determine if native values are present on state trust lands being operated upon. To-date no significant tribal values have been found within the South Puget Planning Unit.

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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.

6.2.4 - Principle 4 – Community relations and worker's rights

To foster good community relations and to garner local involvement, landscape blocks (Map 1) may have focus groups, 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.

WDNR is a responsible employer and public agency. Its policies meet or exceed the legislative requirements in labor relations, public health and safety, and public procurement. The 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". The popularity of State timber sales also indicates that fair wages can be derived from State timber sales.

No non-conformances were identified against this principle.

6.2.5 - 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 processes. The funds generated by resource management are distributed to a number of public trusts, which fund state-wide construction of public schools, universities, prisons and other state institutions, and fund services in many counties, such as libraries, fire fighting, 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

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unit. Down-woody-debris was plentiful on all harvest sites as were standing trees.

The Annual Allowable Cut for the South Puget HCP Planning unit was developed based on a hierarchical analysis using a top-down iterative approach. Initially, the AAC was determined as part of an overall "Westside" AAC. With the development of the Forest Land Plan for the Planning Unit, the forest management strategies and harvest level will be examined using local knowledge and more detailed models. The Planning Unit harvest level was revised in 2010 to approximately 188,207m³ per year (36,700 MBF) by adjusting harvest levels in Kitsap and Pierce Counties

No non-conformances were identified against this principle.

6.2.6 - Principle 6 - Environmental impact

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

The Habitat Conservation Plan (HCP) is a keystone document for the management of all state forest lands in the South Puget HCP Planning Unit. The HCP is a multi-species plan sanctioned by the federal Endangered Species Act with the aim of conserving threatened and endangered species within the range of the northern spotted owl, which include DNR-managed forested state trust lands within the Western part of the State as well as lands on the east slopes of the Cascade Range. The HCP covers a number of species, with primary focus on the northern spotted owl (*Strix occidentalis caurina*) and the marbled murrelet (*Brachyramphus marmoratus*). The HCP also covers several salmonoid species in the rivers of Western Washington as well as six other species (Oregon Silverspot butterfly, Aleutian Canada Goose, Peregrine Falcon, Bald Eagle, Gray Wolf, and Columbian White Tailed Deer).

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

State Environmental Protection Act (SEPA) is used on all timber sales. WDNR Pre-Harvest reviews are conducted for each activity to confirm site conditions and determine environmental liabilities. A review of site

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

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

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.

The WDNR has a program to inventory and identify old-growth forest based on structural condition. It also has a policy to protect all identified old-growth stands of five acres or larger in size. This program for identifying old-growth characteristics was developed with assistance from three of the leading experts on old-growth forest in the

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Pacific Northwest, Dr. Jerry Franklin, Dr. Thomas Spies and Dr. Robert Van Pelt. This procedure is preferable to identification of old-growth based on age alone because it is more comprehensive and accounts for the ecological conditions in unmanaged forest. As a measure of conservatism in implementation, the old-growth policy protects stands meeting the definition based on structural diversity, as well as those that originated prior to 1850. The WDNR policy and program for identifying and protecting old-growth forests is well founded in ecological science and appropriate for protecting the biological and social values of old-growth forests on DNR-managed forested state trust lands.

Snags, legacy trees, and large down woody debris (LDWD) are routinely left on all harvest areas. WDNR retains a minimum of 20 trees per hectare (8 trees per acre) and does not include the riparian areas which are additional acres that are protected. The auditors observed several harvest units with both clumped and dispersed leave trees. The leave areas were not quantified on sites inspected, but every site had obvious leave trees (60 per hectare or 25 per acre) as well as peninsular leave areas and riparian areas where all vegetation remained. Hardwood and shrub layers are controlled in harvest areas largely by not applying herbicides unless it is for invasive plant species control. There was an abundance of residual shrub and herb flora on all harvest sites inspected.

On a majority of harvest sites, the predominate native tree species (Douglas-fir) require openings for regeneration or vigorous young-stand development. The harvest systems used were found to be appropriate and effective for conifer regeneration. Plantings enhance diversity by controlling species composition and age distribution. 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. Designated skid trails are sometimes used in conjunction with ground based logging, but shovel logging is predominately used on tractor logging units. If designated skid trails are used they are rehabbed and made to disperse water runoff upon completion. 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. Landing debris piles are not burned in South Puget Sound Region due to the Puget Sound Clean Air Agency restrictions, regarding burning forest debris inside a large population center, and the resulting smoke management issues. Surfaced roads are waterbarred and generally barricaded. Most roads are gated and access is restricted all or part of the year. Designated roads are open to the public for recreation and hunting.

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

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

The Washington Forest Practices Act regulations with regards to water quality and water bodies exceed those of the FSC 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 have scheduled their removal or replacement. All work is to be completed by 2016. The auditors observed five locations where fish barrier culverts had been replaced.

WDNR does not normally conduct aerial herbicide/pesticide applications on the South Puget HCP Planning Unit, aerial applications are only used in emergency situations when catastrophic insect outbreaks occur. Some ground and hand application is conducted on a very small percentage of the ownership. 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.

During a filed visit to an active logging job, it was discovered that there were no spill kits on site. A non-conformance was issued (6.7.a)

6.2.7 - Principle 7 - Management plan

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

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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).

No non-conformances were identified against this principle.

6.2.8 - Principle 8 - Monitoring and assessment

The WDNR has an extensive monitoring program which addresses all aspects of this principle. Public reports on monitoring activities for the HCP are published annually detailing the results of management activities on the achievement of HCP goals.

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

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

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

WDNR has a detailed timber sales process which allocates most timber (90%) to the highest bidder. The remaining timber is harvested by contractors and sold by the DNR to local mills this program favours smaller contractors. Anyone who harvests timber on the South Puget HCP Planning Unit must enter into a detailed contract that specifies operating conditions and practices. Since certification, the WDNR has maintained a robust chain of custody system to ensure that when

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requested the FSC claim can be transferred to a consuming mill or purchaser.

One non-conformance was raised against this Principle, related to preparing a "written monitoring protocol" for the implementation monitoring program (8.1.a).

6.2.9 - Principle 9 - Maintenance of high conservation value forests

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

The WDNR is implementing a Habitat Conservation Plan to protect threatened and endangered species within the range of the northern spotted owl, which include DNR-managed forested state trust lands within the western part of the State as well as lands on the east slopes of the Cascade Range. The HCP covers a host of species including northern spotted owl, marbled murrelet, salmonids, and other federally listed species. The HCP provides specific direction on the management of timberlands and affects more than 75% of state forestlands and treats a portion of them as High Conservation Value Forests.

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

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springs, snags and structurally unique trees. Through these HCP protection measures, there are numerous federally listed plant species that will be protected.

The Special Ecological Features Policy defines how such features are identified and protected through the Natural Areas Program. Special ecological features are those species, specialized habitats, ecosystems and other natural features that are in need of special management consideration for their long-term survival. These include rare species and rare ecosystem types, as well as widespread ecosystem types that are threatened in some manner. Special ecological features may be priorities for inclusion within the statewide system of natural areas, including Natural Area Preserves and Natural Resources Conservation Areas.

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

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

Input provided by NOAA (National Marine Fisheries Service), it was confirmed that WDNR was in compliance with all HCP monitoring and compliance requirements. Effectiveness monitoring is being conducted in all planning units. It was reported that the WDNR does a fine job of compliance monitoring and that the WDNR has good communication with the Service.

No non-conformances were identified against this principle.

6.2.10 - Principle 10 - Plantations

Not applicable.

6.3 - Elements subjected to controversy

None

6.4 - Previously raised major Corrective Action(s) Request(s)

No major corrective action requests have been issued against WDNR.

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6.5 - Pending minor Corrective Action(s) Request(s) and Recommendations

None

6.5.1 - Minor corrective actions requests

Two minor corrective action requests were issued during the recertification audit.

N'	Minor corrective actions requested	Realization deadline proposed	Requirement number	
01	Prepare a "written monitoring protocol" for the implementation-monitoring program.	12 months	FSC-US FM (v.1), P8.1.a	
02	Short-Term: The operator to be 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.	12 months	FSC-US FM (v.1), P6.7,a	
	Long-Term: The WDNR is to verify by physical inspection that all spill kits required in the contract are on site prior to commencement of operations.			

Comments:

CAR 1: WDNR has a robust and active implementation monitoring program. This program does not have a written protocol outlining its objectives, sampling regimes and methods. This was classified as a minor CAR as it is an isolated incident were WDNR did not have a formal protocol and the activity itself has been effectively and continuously carried out.

CAR 2: During a visit to an active harvesting operation it was discovered that there were no spill-kits on site. This was classified as a minor CAR as it was an isolated incident as other logging contractors were found to have the appropriate safety equipment on site.

6.5.2 - Recommendations

None issued

7 - Certification scope

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

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

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- Spruce
- Pacific Silver Fir
- Cottonwood
- Bigleaf Maple
- Lodgepole Pine

Additionally, the following Non-Timber Forest Products are included:

- Boughs for wreaths
- Salal and other floral greens.
- Sword fern for floral greens
- Evergreen huckleberry for floral greens

7.1 - Geographical restriction for the forest entity

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

7.2 - Restriction at the forestry product level

The scope covers roundwood and wood chips for the species listed above.

8 - Certification decision

8.1 - Proposals regarding the certification decision

Based upon the 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.

8.2 - Certification decision

Certification recommendation proposed by BV audit team is adequately justified, based on detailed audit findings presented in this report. The technical review of the report and relevant documented evidence indicates that the certification process has been performed in conformity with FSC requirements. Therefore it is recommended that an FSC FM/COC certificate be awarded to the organisation.

Issued March 17, 2013, reviewed the April 12, 2013

FM certification technical manager,

Lead Auditor,

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Hubert de Bonafos

Brian Callaghan

Driv Callagh

B. Surveillance audit n° 1

The first surveillance audit of the Washington Department of Natural Resources, South Puget Sound planning unit examined their compliance with the FSC US Forest Management Standard v1.0.

9 - Base of evaluation

9.1 - Date of the surveillance evaluation

October 21-24, 2013

9.2 - Composition of the audit team

Lead auditor: - James M. Colla, RABQSA qualified lead auditor;

FSC FM lead auditor on behalf of Bureau Veritas

Certification, employee.

Auditors: - Gregory Bassler, FSC FM auditor on behalf of

Bureau Veritas Certification, contractor.

9.3 - Forest management referential used for the surveillance audit

For this surveillance audit, we referred to the checklist (ref. FSCUS FM) extracted from the forest management referential for the FSC US Forest Management Standard v1.0. In addition FSC-STD-20-007 v3.0, Forest Management Evaluations; is applicable. No changes have occurred to either standard since the 2012 recertification audit.

10 - Information collecting modalities

10.1 - Description of the audit program

The audit began with an opening meeting where audit objectives and scope were discussed along with field sampling and confidentiality. The auditor reviewed Washington Department of Natural Resources- South Puget Sound Planning Unit (WDNR) forest management records and record keeping systems; documents, policies and procedures; and internal management

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controls. Field activities were evaluated by examining 24 sites where silvicultural activities have been applied since the last audit in 2012.

Date: October 21, 2013

Time		Activity	BVC Repr.	Company Repr.
09:00	AM	Opening Meeting	Jim Colla	Lislie Sayers
			Greg	Danielle Munzing
			Bassler	
09:30	AM	WDNR update		
10:00	AM	Review progress on outstanding CARs		
11:00	AM	Document Review Colla P1, P2, P3, P5, P8		
		Bassler P4, P6		
12:00	PM	Lunch		
01:00	PM	Document Review continued		
04:30	PM	Daily debrief		
05:00	PM	Depart site		

Date: October 22, 2013

Time		Activity	BVC Rep.	Company Rep.
08:30	AM	Arrive WDNR Offices	Colla	Sayers
09:00	AM	Document review continued	Bassler	Munzing
04:30	PM	Debriefing		-
05:00	PM	Depart		

Date: October 23, 2013

Time		Activity	BVC Rep.	Company Rep.
07:30	AM	Depart Olympia		
08:00	AM	Field Tour – Capitol (team 1)	Bassler	Sayers
		- Elbe/Tahoma (team 2)	Colla	Munzing
04:00	PM	Return Olympia		
04:30	PM	Daily Debrief		
05:00	PM	Depart		

Date: October 24, 2013

Time		Activity	BVC Rep.	Company Repr.
07:30	AM	Depart Olympia		
08:00	AM	Field Tour - Green Mountain (team 3)	Colla	Sayers
		Black Diamond (team 4)	Bassler	Munzing
03:00	PM	Compile Findings (auditors rendezvous)	Colla	
			Bassler	
03:30	PM	Preliminary Closing Meeting	Colla	Sayers
04:00	PM	Depart		

10.2 - Total man days for the audit

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A total of eight person days was spent on the surveillance evaluation, including time spent in audit preparation, on auditing documents and records, interviewing stakeholders, carrying out field work and report writing.

10.3 - On-site visit(s)

During the audit a number of sites covering a range of activities were visited by the auditors. Sites visited and activities reviewed included, but were not limited to, harvested and regenerated units, pre-commercial activities, streamside management zones, Endangered Species Act conformance, and the road infrastructure.

SITES	AUDITOR	DATE	DESCRIPTION
Alder ala Carte – 65528; Stop en Smile – 81282; Alderego – 82182; Upper Succotash – 17345; Hambone – 45041; Nisqually TS – 80452 (active)	Colla	October 23	Multiple activities including: variable retention harvest, final harvest, right-of-way active harvest, ground based chemical site prep, hand cutting for vegetation control, road construction and maintenance, road abandonment, reforestation and recreational use. Protection and enhancement related to green tree retention, Northern Spotted Owl, Marbled Murrelet streams and wetlands, aesthetics and landslide risk. Full regulatory and BMP conformance, operational and planning related criteria and indicators. Interviewed one contractor to verify conformance with NC02. No safety specific language in harvest contract leading to NC03. Field site visit forms contain additional detail.
Copper Ridge Group Research Area - 29188 & 29189; One Mean Horse Sale – 8431; Perry Creek Quarry - 71992; Short Sorts U1 & 2 – 80602; McLane TS U3 - 21070; McLane Creek Nature Trail; Woodard Bay Natural Resources Conservation Area (HCVF)	Bassler	October 23	Multiple activities including: collaborative research, variable retention harvest, final harvest, ground based chemical site prep, noxious weed control, road maintenance, reforestation and recreational use. Protection and enhancement related to HCVF, green tree retention, Marbled Murrelet streams and wetlands, aesthetics. Full regulatory and BMP conformance, operational and planning related criteria and indicators. No safety specific language in harvest contract leading to NC03. Field site visit forms contain additional detail.
King Anderson – 23620 (active); Overlook – 81203; 9 – GM5 bridge – 82182; 1Tin Mine – 17446; Sparrow – 17446	Colla	October 24	Multiple activities including: variable retention harvest, final harvest, ground based chemical site prep, precommercial thinning, hand cutting for vegetation control, road construction and maintenance, culvert removal and bridge installation and recreational use. Protection and enhancement related to green tree retention, Bald Eagle, streams and wetlands, aesthetics and landslide risk. Full regulatory and BMP conformance, operational and planning related criteria and indicators. Verify conformance with NC02 on one active job, contractor not available. Field site visit forms contain additional detail.
Page Thin and VRH TS - 61202; Nui Moku PCT - 77213; Gale Unit 1 - 77203; Goat Trail Road Fish Pipe	Bassler	October 24	Multiple activities including: variable retention harvest, final harvest, ground based chemical site prep, noxious weed control, hand cutting for vegetation control, road maintenance, culvert removal and replacement, reforestation and recreational use. Protection and enhancement related to green tree retention, Northern Spotted Owl, streams and wetlands, aesthetics. Full regulatory and BMP conformance, operational and planning related criteria and indicators. Field site visit forms contain additional detail.

10.4 - Documents review

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A number of documents were presented for review, the auditors reviewed select portions of these documents. In addition, operational records for site specific activities were reviewed.

- a. Timber Sale Contract Clause and Administration Manual G250 compliance w/laws
- b. Report: The Goldmark Agenda Strategic Plan 2010-2014
- c. 2012 FSC Public Summary Report
- d. Skokomish Tribe Litigation Summary
- e. Forest Land Planning (list of tribes solicited and cultural resources address in SP planning unit)
- f. SEPA checklist
- g. Tribal Relations Program Information
- h. Cultural Resources Porgram Information
- i. OSHA Rules and Regulations
- i. WAC 296-800-13020-13025
- k. L & I Safety Rules
- I. Air Quality Sampling
- m. Safety and Health News
- n. DNR Safety Improvement Plan Steps for Managers
- o. Safety Standards for Logging Operations, Chapter 296-54 WAC
- p. Timber Sale Contract Clause and Administration Manual
- q. Conifer Release; Ground Herbicide (section A-13 Safety Compliance)
- r. Conifer Release; Hand cutting (section A-13 Safety Compliance)
- s. Pre-Commercial Thinning (section A-13 Safety Compliance)
- t. 2013 SPS Region Stakeholder and Public Outreach List
- u. Notice to apply herbicide neighbor letter
- v. Forest Land Planning Public Process Example: SPS Scoping: Local Knowledge / Stakeholder workshops: agenda, meeting announcements to stakeholders and tribes, outcomes, stakeholder outreach list, scoping meeting info, response to scoping comments, determination of significance, focus of EIS document
- w. Report: South Puget HCP Planning Unit SOLD (FSC) sales and Westside REMOVALS compared to the SHC for FY 2005-2013 (9.20.13)
- x. Report: Summary of Activities for SP HCP Planning Unit (FSC 6.1.a) for FY13/FY12 / FY11 / FY10
- y. 10 year roll-up 2002-2011 (also has PCT)
- z. 10 year roll-up 2003-2012 (also has PCT)
- aa. Natural Heritage Plan
- bb. NatureServe (Oct 2010)
- cc. NSO Surveys on DNR-Managed Lands In SW WA
- dd. Washington State Forest Practices Rules, 2002 (updated 6/8/2009)
- ee. Habitat Conservation Plan (Dec 2012)
- ff. Ch 4A. Minimization and Mitigation for the Northern Spotted Owl in the Five West-side and All East-side Planning Units (1,469KB PDF)

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- gg. Ch 4B. Minimization and Mitigation for the Marbled Murrelet in the Five Westside and the OESF Planning Units - (387KB PDF)
- hh. Ch 4C. Minimization and Mitigation for Other Federally Listed Species in All Planning Units (390KB PDF)
- ii. Ch 4D. Riparian Conservation Strategy for the Five West-side Planning Units (1,022KB PDF)
- jj. Incidental Take Permit
- kk. Biological Opinion
- II. G-023 Contract clause
- mm. PO14-014 Public Access and Recreation
- nn. Policy: PO17-008 Old Growth Stands in Western Washington
- oo. Westside old growth assessment package: includes assessment description, decision pathway, assessment form, secondary screening information, DNR (Oct 2010)
- pp. Forestry Handbook Procedure PR 14-005-050 Maximum Size for Even-Aged Final Harvest Units (Dec 2009)
- qq. Data: Average Acre Size presented 2013 w/ list of sales & compared years
- rr. RCW 17.10.145 State Agencies duty to control spread of noxious weeds
- ss. DNR Procedure PR 14-006-050 Controlling Invasive Plants and Noxious Weeds (2007)
- tt. FY 2012 Silviculture Activity report
- uu. FRIS: Forest Resources Inventory System
- vv. DNR Monitoring Report, NAP, RCCAs
- ww. RMAPS: South Puget Sound RMAP Introduction
- xx. DNR's State Lands Effectiveness Monitoring: (DNR's HCP)

10.5 - Stakeholders identification and consultation

Stakeholders were first identified and were formally consulted prior to the 2012 recertification audit. Consistent with FSC stakeholder consultation requirements (i.e. FSC-STD-20-006) consultation is only required "where necessary", meaning in relation to outside complaints, stakeholder concerns, and controversial activities. However, as WDNR is a public agency, Bureau Veritas solicits stakeholder comments for each audit. The stakeholder list has been updated to reflect name changes of various members as appropriate.

Two comments were received by BV during the 2013 surveillance audit; both were very positive and supportive of WDNR efforts.

- Rod Fleck Attorney/Planner, City of Forks, WA
- John Aldana Superintendent, Olympic Corrections Center, Forks, WA

10.6 - Interview(s) of involved people met

Executive Management:

Kyle Blum, Deputy Supervisor for State Uplands

Forest Resources Division (FRD) Staff:

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Julie Sackett, Division Manager

Allen Estep, Assistant Division Manager-HCP and Scientific Consultation Section

Danielle Munzing, Acting HCP and Scientific Consultation Section, Program Lead, PSF / Certification

Lislie Sayers, HCP and Scientific Consultation Section, Program

Implementation Lead, Forest Certification

Angus Brodie, Assistant Division Manager-Data Stewardship

Tony Ifie, Assistant Division Manager-Policy and Training

Candace Johnson, Assistant Division Manager-Silviculture

Product Sales & Leasing Division (PSLD) Staff:

Darin Cramer, Division Manager

Paul Bialkowsky, Assistant Division Manager-Product Sales

Conservation, Recreation, and Transactions Division (CRTD) Staff:

Jed Herman, Division Manager

Pene Speaks, Assistant Division Manager-Natural Areas / Natural Heritage

Pacific Cascade Region Staff:

Bob Johnson, Assistant Region Manager - State Lands

Scott Sargent, Black Hills District Manager

Don Melton, Unit Forester - Capitol Forest

Dave Gufler, Intensive Management Forester – Black Hills District

Chris Rasor, Intensive Management Coordinator - PC Region

Noelle Nordstrom, Biologist

Phil Wolff, Recreation Specialist

Brandon Austin, Forester

South Puget Sound Region Staff:

Art Tasker Region Manager

Dave Lorence, Assistant Region Manager - State Lands

Ted Keeley, District Manager

Dave Denis, Forest Manager - Belfair Unit

Brandon Mohler, Forest Manager – Elbe/Tahoma Unit

Lee Roach, Forest Manager - Black Diamond Unit

Brian Williams, Intensive Management Coordinator

Alan Mainwaring, Biologist

Contractors:

John Gambell

10.7 - Other evaluation techniques

None.

10.8 - FSC trademark use control

Off product uses have been sought and approved by Bureau Veritas in three cases; a brochure that describes Certification Opportunities for Purchasers, the 2012 HCP Annual Report; and WDNR's Forest Certification Website.

10.9 - Controversial elements

None observed.

10.10 - Changes since last audit

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The Washington Department of Natural Resources, South Puget Sound Planning Unit has not excised or otherwise disposed any forest lands since the last audit in 2012. The size is presently 69,930 hectares (172,801 acres). Ms. Lislie Sayers remains the designated contact. While updates are on-going for certain elements there have been no changes in the management structure or system.

10.11 - Surveillance audit closing meeting

A preliminary closing meeting was held in the field on October 24, 2013. Lislie Sayers was present. At the meeting we discussed audit findings, next steps, nondisclosure and appeals. The auditor's conclusion was to recommend continued certification; this finding was acceptable to WDNR. Results were shared with other staff during a follow up conference call and final closing meeting on November 20, 2013.

11 - Audit team observations

11.1 - Actions taken in order to answer to the non-conformities from the previous audit

There were two minor non-conformities during the 2012 recertification audit.

NC #	NC description	P&C indicator number	Action taken by the entity to close the NC	Closed/ Open	Date of Closure
01	WDNR has an active implementation monitoring program. Monitoring results are faithfully reported upon. There is no "written monitoring protocol" available as required by the standard	FSC-US FM (v.1), P8.1.a	Prepared a "written monitoring protocol" for the implementation-monitoring program.	Closed	24 October 2013
02	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.	FSC-US FM (v.1), P6.7,a	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.	Closed	24 October 2013

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Comments:

There have been no new complaints or disputes raised by stakeholders to either the certificate holder or Bureau Veritas since the recertification audit. There remains on-going litigation with the Snohomish Tribe, which is not applicable or related to any FSC Principles.

11.2 - Action taken in order to answer to previous recommendation

No observations were raised during the recertification audit.

11.3 - Evaluation of the general conformity level of the entity

The auditors were pleased with the performance of WDNR since the last audit. The WDNR continues to comply with the numerous mandates and policies under which they operate. WDNR has a very experienced compliment of staff who continues to effectively manage their forest.

WDNR has among the best documented forest management systems in North America. They operate an effective public planning system in an area of high public visibility. To ensure that operations are implemented appropriately and to gauge objective achievement a complete suite of monitoring systems are in place. Required planning and operational updates are occurring as scheduled. They continually update their information systems and undertaken effective operations. The monitoring program is robust and reliable, and independently verified. The organization continues to operate in compliance with the FSC US Forest Management Standard (v1.0).

11.4 - Eventual changes in the scope of certification

None expected in the near term, see observations.

12 - Proposals regarding the certification decision

12.1 - Description of new observations

1.6.b. The South Puget HCP Planning Unit is one of nine state land planning units. It is the first and only unit to be audited for FSC certification because it is the first and only area to have completed a Forest Land Plan. WDNR has publicly, since first becoming certified in 2007, stated they are committed to FSC certification of all their lands over time as Forest Land Planning is completed in the other regions. As a public agency, they are not members of FSC and are not required to certify all their lands. The original commitment statement is unchanged from 2007. Given the Olympic Experimental State Forest Plan may be complete within the next year and the FSC FM standard has changed since WDNR was first certified, a review may be in order to determine the current applicability of the original commitment to certify all forest lands as Forest Land Plans are completed.

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12.2 - New Minor Non-Conformities

One new minor non-conformity has been issued.

N°	Minor Non-Conformity	Proposed date of implementation	Requirement number
03	Timber Sale Contracts (both Stumpage and Contract Harvest) do not include specific safety requirements. This is considered a minor deviation as contracts do specify compliance with all applicable requirements and silviculture contracts include written safety requirements.	12 months	FSC-US FM (v.1), P4.2.b

12.3 - New Major Non-Conformities

N°	Major Non-Conformity	Proposed date of implementation	Requirement number
	None issued		

12.4 - Conclusion of the audit team

The Washington Department of Natural Resources – South Puget Sound Planning Unit continues to manage the forest land to a very high standard and continues to meet the requirements for FSC certification. Continued certification is recommended.

13 - Certification decision

FSC Forest Management Certification of the Washington Department of Natural Resources; South Puget HCP Planning Unit shall be continued.

Issued the end of 20 November 2013, reviewed 29 November 2013

FM certification technical manager,

Brier Callafur

Lead Auditor,

Brian Callaghan

James M. Colla

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C. Surveillance audit n° 2

The second surveillance audit of the Washington Department of Natural Resources, South Puget Sound planning unit examined their compliance with the FSC US Forest Management Standard v1.0.

14 - Base of evaluation

14.1 - Date of the surveillance evaluation

October 20-23, 2014

14.2 - Composition of the audit team

Lead auditor: - Brian Callaghan RPF EP(EMSLA) qualified FSC FM

lead auditor on behalf of Bureau Veritas

Certification, contractor.

Auditors: - Julie Stangell, FSC FM auditor on behalf of Bureau

Veritas Certification, contractor.

14.3 - Forest management referential used for the surveillance audit

For this surveillance audit, we referred to the checklist (ref. FSCUS FM) extracted from the forest management referential for the FSC US Forest Management Standard v1.0. In addition FSC-STD-20-007 v3.0, Forest Management Evaluations; is applicable. No changes have occurred to either standard since the previous audit.

15 - Information collecting modalities

15.1 - Description of the audit program

The audit began with an opening meeting where audit objectives and scope were discussed along with field sampling and confidentiality. The auditor reviewed Washington Department of Natural Resources - South Puget Sound Planning Unit (WDNR) forest management records and record keeping systems; documents, policies and procedures; and internal management controls. Field activities were evaluated by examining 29 sites where silvicultural activities have been applied since the last audit in 2013.

Date: October 20, 2014

Time		Activity	BVC Repr.	Company Repr.
09:00	AM	Opening Meeting	BC JS	LS
09:30	AM	WA DNR update	BC JS	LS
10:00	AM	Review progress on outstanding CARs	BC JS	LS
11:00	AM	Document Review	BC JS	LS
12:00	PM	Lunch	BC JS	LS

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Time		Activity	BVC Repr.	Company Repr.
01:00	PM	Document Review continued	BC JS	LS
04:30	PM	Daily debrief	BC JS	LS
05:00	PM	Depart site		

Date: October 21, 2014

Time		Activity	BVC Repr.	Company Repr.
08:00	AM	Document Review - Stakeholder Interviews	BC JS	LS
12:00	PM	Lunch	BC JS	LS
01:00	PM	Document Review continued	BC JS	LS
04:30	PM	Daily debrief	BC JS	LS
05:00	PM	Depart site		

Date: October 22, 2014

Time		Activity	BVC Repr.	Company Repr.
07:30	AM	Depart Olympia	BC JS	LS
08:00	AM	Field Tour – Snoqualmie (Callaghan) - Black Diamond (Stangell)	BC JS	LS
04:00	PM	Return Olympia	BC JS	LS
04:30	PM	Daily Debrief	BC JS	LS
05:00	PM	Depart		

Date: October 23, 2014

Time		Activity	BVC Repr.	Company Repr.
07:30	AM	Depart Olympia	BC JS	LS
08:00	AM	Field Tour – Delphi (Callaghan)	BC JS	LS
		- Hoodsport/Belfair (Stangell)		
03:00	PM	Return Olympia	BC JS	LS
03:00	PM	Compile Findings (auditors rendezvous)	BC JS	LS
03:30	PM	Closing Meeting	BC JS	LS
04:00	PM	Depart (drop at SeaTac)		

Note: BC=Brian Callaghan, JS=Julie Stangell, LS-Lislie Sayers

15.2 - Total man days for the audit

A total of ten person days was spent on the surveillance evaluation, including time spent in audit preparation, on auditing documents and records, interviewing stakeholders, carrying out field work and report writing.

15.3 - On-site visit(s)

During the audit a number of sites covering a range of activities were visited by the auditors. Sites visited and activities reviewed included, but were not limited to, harvested and regenerated units, pre-commercial activities, streamside

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management zones, Endangered Species Act conformance, and the road infrastructure.

			Area	
Date	Auditor	Site No.	(ha)	Comments & Findings
22-Oct	Callaghan	Karisrun U3	25	Variable Retention Harvest (25 ha) including 5 ha planted in 2013 with Douglas fir and Red cedar. Slash has been piled for disposal as biomass. A small amount of harvesting in the RMZ, no issues. Residual standing timber meets requirements.
22-Oct	Callaghan	Tiger Thinning U2	19	New bridge established on road into area. Excellent installation. Features placed in stream to create habitat. Thinning job looks fine, no issues.
22-Oct	Callaghan	Poo, Poo Point	5	Recreation site used as a launch point for Parasailing and hang gliding. Harvests in the area have been modified to suit the activity.
22-Oct	Callaghan	West Tiger CommSite1	3	Small clear cut undertaken to clear site lines around Communications Site. The area will be planted in Noble fir.
22-Oct	Callaghan	East Tiger Off- the-Grid Mountain Biking Trail		Recreational bicycle trail which was designed and built with the help of volunteers. Various trails of varying difficulty. Trails are well built for both challenge and safety.
23-Oct	Callaghan	Sterling U1	23	Good in block roads, excellent retention. Large trees carefully logged to maximize safety and minimize damage. Part of area spot sprayed for witches broom with Garlon.
23-Oct	Callaghan	Waddell Divide U1	8	(McFarland Cascade) Gordon Pogorelc (North Fork Timber)
23-Oct	Callaghan	Needle U1	23	Active high site job. Variable Retention Harvest. Interviewed Steve McKnight (McFarland Cascade) and Gordon Pogorelc (North Fork Timber)
23-Oct	Callaghan	Lokie U2	12	Hand removal of hardwoods and Alder from a 15 year old Douglas fir planted site. No issues.
23-Oct	Callaghan	Moto	21	VRH area with aerial chemicals using Accord. No offsite application found. Low dose to only impact hardwoods.
22-Oct	Stangell	Dendron Unit 1	17	VDT, road in good shape on DNR; road on adjacent landowner needs work (PCC), logger just pulled out due to wet weather, will come back in to finish.

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			Area	
Date	Auditor	Site No.	(ha)	Comments & Findings
22-Oct	Stangell	Dendron Unit 6	5	VRH, leave area greater than harvested, retaining 155% of stand. Yellow tags delineate leave tress; trees marked both individually and clumped, within 400' of next leave tree.
22-Oct	Stangell	Dendron Unit 7	15	VRH, retaining 70% of stand; leave trees clumped around streams and headwalls; units 6 and 7 not yet harvested.
22-Oct	Stangell	Dendron Unit 2 Donkey Skid	n/a	VDT in Unit 2, drive-by, looks good. Donkey skid 60-70 years old, site management plan written, skid protected as cultural resource.
22-Oct	Stangell	Snoopy PCT	19	Unit PCTed in 2006; looks good, drive-by.
22-Oct	Stangell	5400 1P (Seaboard PCT)	4	Unit laid out for PCT, contractor select, plots will be taken behind contractor to ensure contract requirements are met.
22-Oct	Stangell	Bear Claw Unit 1 & 2	14 & 2	VRH, streams protected with marked RMZs, Unit 2 has variable thinning in the RMZ, thinned outer 75', inner 25' no harvest, equipment on edge, well-marked, contractor and DNR both taking plots to ensure retention trees left.
22-Oct	Stangell	Bear Claw Unit 3	36	Ground-based and cable thinning; VDT with relative density of 40 in ground based portion, cable mostly done, but not complete due to wet weather.
22-Oct	Stangell	5400 Rd Pipe	n/a	36" pipe replaced with 72" pipe; non-fish due to stream gradient, rock source on site, nice installation
22-Oct	Stangell	Bear Claw Unit 6	26	VRH, some cable logging not yet completed; 54 % retention with RMZs, WMZ, spatially delineated clumps not entered. Clumps GPSed to identify on map is standard practice.
23-Oct	Stangell	3 Bears Unit 1	21	VRH in 2012, planted in 2013, regeneration survey complete in 2013, will follow-up with survival survey; hand pull of scotch broom as noxious weed abatement in 2014. No issues.
23-Oct	Stangell	Overlook Unit 4	12	VRH in 2013, ground herbicide application in 2013, planted with DF and cedar; site prep looks good, excellent large woody debris retention, site tree retention, mostly single trees, moving toward clumping trees. Excellent unit.

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Date	Auditor	Site No.	Area (ha)	Comments & Findings
23-Oct	Stangell	Proposed Trailhead for ORVs	n/a	Green Mountain/Tahuya Recreation Plan, separates uses, focus groups of users work out uses. Green Mountain predominately non- motorized. Education & enforcement officer funded by grant, proposal to build parking area for motorcycles. Work in progress, lots of time/energy to coordinate public with opposing views. Excellent work.
23-Oct	Stangell	Oak Patch NAP	7	Oregon white oak woodland, no hunting, no access to area (fenced), area looks good, several species of concern in area. Area surveyed annually.
23-Oct	Stangell	Scarification Unit 3	30	Active harvest (falling), interviewed logger says trained logger regularly on site but Dale working alone and he is not trained.
23-Oct	Stangell	Barbless U3	17	VRH in 2012, planted in 2013, regeneration survey in 2013 indicated heavy browse and brush competition, the unit was not site prepped, inner-plant completed in 2014
23-Oct	Stangell	Barbless Road Abandonment Culvert	n/a	Interviewed staff; discussing road plan, outside timber sale unit.

15.4 - Documents review

Title	Author	Date
Timber Sale Contract Clause and Administration Manual	DNR	2014
Timber Sale Contract Administrator's Reference Manual	DNR	2010
FSC 2011 Final Report	Bureau	2011
	Veritas	
DNR 2013 Annual Report	DNR	2013
Map: State Trust Lands	DNR	2010
RCW 79: Public Lands	WA Leg.	Printed
		9/17/2014
Commissioner's Order # 201029, Tribal Relations	DNR	9/10/2010
Website printout: DNR's Tribal Relations website	DNR	Printed
		9/18/2014
Governor's Executive Order 05-05		11/2005
Documentation (emails,) of examples of cooperation	DNR	2006–2013
and mitigation with Chehalis, Yakima, Colville, Puyallup,		
Jamestown, and Samish tribes and the Lummi Nation		
DNR Policy PO08-034 Protect Archaeological and	DNR	12/19/2003
Cultural Resources		
Agendas and media advisories for 2010, 2011, and 2012	DNR	2010–2014
DNR Tribal Summits as well as meeting schedule for		

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Title	Author	Date
2014 summit		
DNR SEPA Checklist	DNR	5/2014
Quadrant Map showing boundaries of ownership	DNR	2003
(Snoqualmie Pass)		
Timber Sales Bidding Opportunities	DNR	9/17/2014
Auction Book #944	DNR	9/2014
Example: Killdeer TBS Auction Packet	DNR	9/2014
Product Sales Viewer: Advanced User Guide	DNR	3/2014
Product Sales and Leasing Division PR14-006-093	DNR	4/2011
(Painting and Marking)		,,,,
PO17-001 Establishing Boundaries of State Land	DNR	8/2006
Website: Public Lands Survey Office	DNR	Printed
Trosonor rusino Zarido Garvoy Ginios	21111	9/18/2014
58.09 RCW Surveys – Recording	WA Leg.	Various dates
332-130 WAC Minimum standards for land boundary	WA Leg	4/9/2010
surveys and geodetic control surveys and guidelines for	Witteg	17072010
the preparation of land descriptions		
Public Land Survey Office Brochure	DNR	2013
Memo: Guidelines for updating GIS land corners with	DNR	9/2006
resource grade GPS	DIVIX	3/2000
Memo: DRAFT standard for Garmin – type GPS,	DNR	2013
Procedures to locate known land corner positions in	DIVIC	2013
situations where a legal land survey is not required.		
Example: Bald Bruin TBS email w/maps	DNR	5/21/2012
RCW 27.44, RCW 27.53, RCW 68.60, RCW 79.90.565,	WA Leg. and	Various dates
WAC 25.48, WAC 222-16-010, PO06-001, Policy PO08	DNR	various dates
- 034, and Policy PO14-016	DIVIX	
DNR's Safety Survey 2011 Results (email &	DNR	2011
presentation)	DIVIC	2011
Proposal for Development of a Strategic Safety Process	DNR	11/02/2012
for Washington State Department of Natural Resources	DIVIN	11/02/2012
DNR's Strategic Plan: 2010–2014 (Goal VI.E)	DNR	2010
Injury Prevention Manual (w/table of contents)	DNR	Printed 9/2/2014
Safety Improvement Initiatives (w/Safety Improvement	DNR	10/2011
plan)	DIVIX	10/2011
Safety Statistics Q4 2013	DNR	2013
Email notification of additional language for G-250	DNR	12/12/2013
related to safety (WAC 296.54) and (RCW 76.04 and	DINIX	12/12/2013
WAC 332.24) w/Logging Plan of Operations		
Program Guidance for Implementation of Contract	DNR	1/2011
Clause G-116 (SFI Certification) includes training	DINK	1/2011
requirements		
Timber Sale Manual: G-250: Compliance w/all laws and	DNR	2014
contract clauses	DINL	ZU1 4
	WA Leg	2012
WAC 296-54, Safety Standards for Logging Operations	DNR	
SIC Recommendations for Qualified Loggers (i.e.	DINK	6/3/2010
contractor training recommendations)	DND	9/2/2007
Forest Land Planning Public Process Example:	DNR	8/2/2007
- OESF Scoping: determination of significance, Non-		
Project Review Form, Summary of Input for Scoping,		
Summary of Public Comments received in Scoping,		

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Title	Author	Date
comment report by issue, presentations, communication		
plan; summary of scoping		
Website: SEPA SharePoint site	DNR	Printed
		9/25/2014
SEPA Checklist Resources Guide	DNR	3/2009
SEPA: Responding to Comments Guidance	DNR	Printed
		9/18/2014
Nisqually River Council Website (printed)	NRC	Printed
, ,		10/14/2014
Nisqually River Council Agenda w/minutes (Ted Keeley	NRC	1/2014
represents DNR)		
Nisqually River Council Newsletter	NRC	Winter 2013
Nisqually River Council Project Example: Water Quality	NRC	2014
Monitoring (education)		
Notice to apply herbicide neighbor letter (template), Pre-	DNR	12/2012
signage, Post-signage		
SEPA Mailing List	DNR	9/2014
Examples of Adjacent Landowner	DNR	2011, 2013
notification/cooperation information: Notifying adjacent		
landowners of Barbless and Nutty Buddy timber sales		
Responses to comments on Lost & Found TS, Nutty	DNR	2012, 2013,
Buddy TS, Pumpkin TS, and Killdeer TS		2014, 2014
Cutting line agreement, Barbless TS	DNR	2011
Average annual cut / annual growth for south Puget	DNR	2007
(growth/yield), Email: FSC Post-audit documentation		
regarding growth (also use w/ CMAI)		
Report: 05-07 sold by species for SP HCP Planning Unit	DNR	2007
Report: South Puget HCP Planning Unit SOLD (FSC)	DNR	2014
sales and Westside REMOVALS compared to the SHC		
for FY 2005–2014		
BNR Resolution 1333, adjusting decadal Sustainable	DNR	2010
Forest Management Harvest Level for forested State		
Trust lands in Pierce and Kitsap counties		
Sustainable Harvest Calculation to date for Pierce/Kitsap	DNR	2014
SH units (2005–2014)		
Regeneration Harvest Unit Stand Age and Adjacent	DNR	2011–2014
Stand Age		
Used for Culmination of Mean Annual Increment (CMAI)		
and Adjacency-Greenup		
- FY11 Table / Maps		
- FY12 Table / Maps		
- FY13 Table / Maps		
- FY14 Table / Maps		
- FY15 Table / Maps	DND	\/orious \/orio
Reports: Summary of Activities for SP HCP Planning	DNR	Various years
Unit		
FY14 Summary of Activities: Acres of regeneration, site		
prep, survey, timber harvest vegetation management,		
plantings by species; FY14 planting tables- total # of species planted; FY14 herbicide tables - chemical types,		
quantity of chemicals; Email listing the Clear Cuts; 10		
quantity of offerficals, Effall fishing the Oleaf Cuts, 10	<u> </u>	

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Title	Author	Date
year roll-up 2005–2014		
8-year review: Sustainable Harvest Analysis: FY05-12	DNR	9/2012
A Review of the Western WA Decadal Sustainable		
Harvest Year Eight		
Sustainable Harvest Calculation packet - Westside,	DNR	Various years
including: Board decisions and related materials,		
environmental review documents, background		
information, socioeconomic research, economic		
research, additional information, and updates for the		
SHC 2014		
South Puget Forest Land Plan and Appendices (A–P)	DNR	2012
Updated Forestry Handbook, especially FMU Rotational	DNR	2014
Objectives (PR 14-005-010), Silvicultural Rotational		
Prescriptions (PR14-005-060), and Reforestation (PR		
14-006-010)		
Special Forest Products Plan, 2008–2020	DNR	Printed
FILLM (O THE TENTE)	DND	9/23/2014
Field Maps for Special Forest Products for Hood Canal,	DNR	2014
East Block Tahuya, West Tahuya/Sherwood/Harstene		
Island, Green Mountain, Key Peninsula, and Grass Mountain		
SPS Brush Lease Examples: 35-090114 West Green	DNR	Various years
Mountain (Effective 7/1/2013–6/30/2015) and 35-088749	ואוע	vanous years
North Elfendahl (Effective 7/1/2012–6/30/2016)		
Final Habitat Conservation Plan	DNR	1997
Forest Practices Activity Map (Sterling U1 Timber Sale -	DNR	2009, 2011
Capitol) showing stream modification w/ Water Type		
Modification Form and Barbless U5 (Tahuya) and		
mitigation email showing species modification; managed		
stand for Shore Pine		
South Puget HCP Planning Unit Forest Land Plan FEIS	DNR	1/2010
South Puget HCP Planning Unit Forest Land Plan DEIS	DNR	7/2008
A Summary of the Current Forest Management	DNR	11/2008
Strategies for the South Puget HCP Planning Unit		
South Puget Forest Land Plan Non-Project Review Form	DNR	6/2005
SP FLP input/output matrix/ working paper An	DNR	9/2007
examination of the Economic Contribution of the		
Alternatives under consideration in the WADNR SPFLP		
(Rural Technology Initiative Working Paper 9 (Jobs,		
Revenues, and Taxes from Timber Harvest; An		
Examination of the Forest Industry Contribution to the		
Washington State Economy	DND	0/0040
NSO Habitat Definition Changes in DNR's SP HCP	DNR	3/2010
Planning Unit WEC vs. Sutherland Settlement		
Agreement Approval	DNR	10/2010
Fact Sheet: Planning for the future for recreation in	אוט	10/2010
Green Mountain and Tahuya State Forest Green Mountain and Tahuya State Forest Open house	DNR	10/2010
comments	אוט	10/2010
Map of the Area Green Mountain and Tahuya State	DNR	1/2011
Forest		1,2011
I UIUUL		l

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Title	Author	Date
Recreation Land Suitability: GEOLOGY & SOILS CRITERIA	DNR	9/2008
Recreation Land Suitability: BIOLOGY MODUAL	DNR	3/2011
Recreation Land Suitability: MANAGEMENT CRITERIA	DNR	5/2011
Maps:	DNR	Various years
Statewide Map showing the planning areasTahuya Green Planning Area map showing all units		
- Tahuya Composite Maps (Facility / Non-Motorized /		
Motorized)		
- Green Composite Maps(Facility / Non-Motorized /		
Motorized)		
•	DNR	10/2006
Policy for Sustainable Forests	DNR	12/2006 7/11/2006
PO14-019 General Silviculture Strategy		7/11/2006
PO14-012 Special Ecological Features	DNR	Duinte et 4/0044
Website: HCP Overview	DNR	Printed 4/2014
Website: HCP Final Habitat Conservation Plan	DNR	Printed 4/2014
HCP Incidental Take Permit	DNR	1997
Biological Opinion	DNR	1997
Natural Heritage Plan and two updates	DNR	2007, 2009, 2011
Natural Heritage Priorities for FY13–FY 15	DNR	4/2013
Definition and Inventory of Old Growth Forests on DNR-Managed State Lands, June 2005	DNR	6/2005
Extent and Distribution of Old Forest conditions on DNR-Managed State Trust Lands in Eastern Washington	DNR	12/2007
The Case for Active Management of Dry Forest Types in Eastern Washington: Perpetuating and Creating Old Forest Structures and Functions	DNR	9/2008
Policy: PO17-008 Old Growth Stands in Western Washington	DNR	
Policy: PO14-019 General Silvicultural Strategy	DNR	
Procedure PR 14-004-045 Old Growth Timber Harvest Deferral and Protection (Westside)	DNR	1/2007
Procedure: PR 14-006-091 Retention and Perpetuation of Legacy Trees, Snags and Downed Wood (Eastside)	DNR	5/2011
SharePoint site for Westside Old-growth	DNR	Printed 10/7/2013
Westside old growth assessment package including approach to Old Growth Assessment description, Determining Canopy Cover, decision pathway, assessment form, secondary screening information	DNR	Various years
Report: Acres of Potential Old Growth and Older Forests in South Puget Sound HCP Planning Unit w/WOGHI attribute definitions	DNR	5/2007
Riparian Forest Restoration Strategy	DNR	4/2006
Field Guide: Managing Wetlands on State Forest Lands in Washington	DNR	6/2000
SharePoint Site: Westside Wetlands Resource Page	DNR	Printed 5/31/2014
Developing Westside Silvicultural Prescriptions: An Inter- Active Self-Study and Reference Pamphlet	DNR	3/2007

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Title	Author	Date
Special Ecological Features policy PO014-013	DNR	
Website: Webster Forest Nursery	DNR	Printed 10/18/2014
Website: Seedling Species Types	DNR	Printed 10/18/2014
Website: Seedling Stock Types	DNR	Printed 10/18/2014
Seedlings Available 2014-2015 Season	DNR	2013
Booklet: How to select, plant, and care for tree seedlings	DNR	2010
Presentation: Alternatives to Methyl Bromide	DNR	
Website: WA Tree Seed Transfer Zones	DNR	Printed 10/18/2014
Manual: WA Tree Seed Transfer Zones (Summer 2002)	DNR	Summer 2002
SEPA Handbook	DNR	9/2010
PR 14-006-090 Management of Forest Stand Cohorts-Westside	DNR	1/2007
PSF Policy: PO14-010 Watershed Systems	DNR	7/2006
Forestry Handbook Procedure PR 14-005-050 Maximum Size for Even-Aged Final Harvest Units	DNR	12/2009
Data: Average Acre Size – presented 2007 w/letter and pictures	DNR	2007
Data: Average Acre Size – presented @ 2008 audit w/compared years	DNR	2008
Data: Average Acre Size – presented @ 2009 audit w/compared years	DNR	2009
Data: Average Acre Size – presented @ 2010 audit w/ list of sales & compared years	DNR	2010
Data: Average Acre Size – presented @ 2011 audit w/ list of sales & compared years	DNR	2011
Data: Average Acre Size – presented @ 2012 audit w/ list of sales & compared years	DNR	2012
Data: Average Acre Size – presented @ 2013 audit w/ list of sales & compared years; includes list and maps of units over 60 acres	DNR	2013
Data: Average Acre Size – presented @ 2014 audit w/ list of sales & compared years; includes list and maps of units over 60 acres	DNR	2014
Data: Harvest Deferral (FY11) Report: FSC 6.3.e.5 (FSC Pacific Coast) Pre-harvest basal area retention; 30%	DNR	2010
Data: Harvest Deferral (FY12) Report: FSC 6.3.g.1 (FSC US) Pre-harvest basal area retention: 33.7%	DNR	2011
Data: Harvest Deferral (FY13) Report: FSC 6.3.g.1 (FSC US) Pre-harvest basal area retention: 58%	DNR	2012
Data: Harvest Deferral (FY14) Report: FSC 6.3.g.1 (FSC US) Pre-harvest basal area retention: 75%	DNR	2013
Data: Harvest Deferral (FY15) Report: FSC 6.3.g.1 (FSC US) Pre-harvest basal area retention: 69.43%	DNR	2014
Email: Leave Tree Deferral Assumption	DNR	12/5/2012
South Puget Forest Land Plan website	DNR	Printed 12/2012
FEIS: South Puget HCP Planning Unit Forest Land Plan	DNR	1/2010

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Title	Author	Date
FEIS		
Silviculture Options for Young-Growth Douglas Fir	USFS	4/2004
Forests: The Capitol Forest Study – Establishment and		
First Results; PNW-GTR-598		
Silviculture Options for Young - Growth Douglas Fir	USFS	4/2004
Forests: The Capitol Forest Study – Establishment and		
First Results; PNW-GTR-598 (April 2004)		
Regeneration of Douglas-fir in the Klamath Mountains	USFS	12/1984
Region, CA and OR; PSW-81 (Dec 1984)		
Response of Douglas Fir advance regeneration to	USFS	9/2008
overstory removal; RMRS-RP-73		
Effects of variable density thinning on understory	USFS	4/2008
diversity and Heterogeneity in young Douglas-fir forests;		
PNW-RP-575		
Growth and mortality of residual Douglas-fir after	Sean Garber,	2011
regenerations harvest under group selection and two-	Tzeng Yih	
story silvicultural selections	Lam, and	
	Douglas A.	
Diametation productivity in the Develop fir region under	Maguire	2/2005
Plantation productivity in the Douglas-fir region under intensive silvicultural practices: results from research	Cheryl Talbert and David	3/2005
and operations	Marshall	
Summary of Activities for SP HCP Planning Unit:	DNR	2014
- FY14 Summary of Activities: Acres of regeneration,	DIVIX	2014
site prep, survey, timber harvest vegetation		
management, plantings by species		
- FY14 planting tables- total # of species planted		
- FY14 herbicide tables - chemical types, quantity of		
chemicals		
- Email listing the Clear Cuts		
- 10 year roll-up 2005-2014		
Regeneration Harvest Unit Stand Age and Adjacent	DNR	Various voors
Stand Age	DINK	Various years
Used for Culmination of Mean Annual Increment (CMAI)		
and Adjacency-Greenup		
- FY11 Table / Maps		
- FY12 Table / Maps		
- FY13 Table / Maps		
- FY14 Table / Maps		
- FY15 Table / Maps		
Five-year growth responses of Douglas-fir, western	T.B.	2006
hemlock and western cedar seedlings to manipulated	Harrington	
levels of overstory and understory competition		
RCW 17.10 Noxious Weeds Control Boards	WA Leg.	
RCW 17.10.007 Purpose – Construction	WA Leg.	
RCW 17.10.010 Definitions	WA Leg.	
RCW 17.10.145 State Agencies' duty to control spread	WA Leg.	
of noxious weeds		
WAC 16-750 State Noxious Weed List and Schedule of	WA Leg.	12/30/2013
monetary penalties		
DNR Procedure PR 14-006-050 Controlling Invasive	DNR	2007
	_	

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Title	Author	Date
Plants and Noxious Weeds		
WA State Noxious Weed Board website (printed		Printed
10.18.14)		10/18/2014
2014 Report of the Noxious Weed Control Board	WA State	2014
covering 2011–2013	Noxious	
3	Weed Control	
	Board	
County Link Map	WA State	Printed
, ,	Noxious	10/18/2014
	Weed Control	
	Board	
Website: How do I participate in upcoming Fuel	DNR	Printed
Reduction Bidding		10/17/2014
Website: Wildfire Fuels Reduction Contracts –	DNR	Printed
Invitations to Bid	21111	10/17/2014
Website: Wildfire Fuel Reduction - Awarded Contracts	DNR	Printed
Trobolic. Whallo I do Roddollon / Wardod Contracto	Divire	10/17/2014
Example Westside Contract: Wildfire Fuels Reduction	DNR	11/2010
Contract, Invitation to Bid – Greenwater Project, DNR w/	DIVIN	11/2010
amendment		
DNR's Forest Practices Division Compliance Monitoring	DNR	3/2009
Report 2006-2007	DIVIC	3/2003
DNR's Forest Practices Division Compliance Monitoring	DNR	1/2011
Report 2008-2009	DIVIC	1/2011
DNR's Forest Practices Division Compliance Monitoring	DNR	4/2012
Report 2009-2011	DIVIX	4/2012
DNR's Forest Practices Division Compliance Monitoring	DNR	7/2013
Report 2012 Interim (Commissioner asked for annual	DIVIC	772013
reports in addition to the required biennium report)		
DNR's Forest Practices Division Compliance Monitoring	DNR	7/2014
Report 2012-2013	DINIX	1/2014
Website: State Trust Lands Effectiveness Monitoring	DNR	Printed
Website. State Trust Lands Effectiveness Monitoring	DINIX	5/26/2014
Fact sheet: NSO Effectiveness Monitoring	DNR	3/20/2014
Field Procedures: Natural Resources Field Procedures	DNR	6/2002
	DINK	0/2002
Forest Resource Inventory System (FRIS)	DNR	2/2009
Report: Tree Blowdown Aerial Survey, WA Coast		3/2008
Summary Report: Landslides, State Trust Lands, and the	DNR	10/2010
January 2009 Storm in Whatcom County	Toodors	10/06/0007
Northern Spotted Owl Surveys on DNR-Managed Lands	Teodora	12/26/2007
in Southwest Washington	Minkova	
DND's Dispuise and Treating Overton (DOT) 11 12	(DNR)	Deintod
DNR's Planning and Tracking System (P&T) User's	DNR	Printed
Manual	DND	5/23/2014
SP FLP input/output matrix/ working paper: An	DNR	9/2007
examination of the Economic Contribution of the		
Alternatives under consideration in the WADNR SPFLP		
(Sept 2009) (Rural Technology Initiative Working Paper		
9) Jobs, Revenues, and Taxes from Timber Harvest; An		
Examination of the Forest Industry Contribution to the		
Washington State Economy		

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Title	Author	Date	
Economic and Timber Revenue Forecast Website	DNR	Printed	
		10/18/2014	
Economic and Revenue Forecast - Fiscal Year 2015 -	DNR	9/2014	
1st Qtr.			
Variance Report for SPS Region 13–15 Q5	DNR	2014	
Meeting scheduler 07.16.14 Lenny/SPS review of	Lenny Young	7/16/2014	
variance reports	(DNR)		
Variance Reports: 13–15 SPS Roll-up	DNR	1/8/2014	
RCW 79.15.050, Type of sale – Direct sales	WA Leg.	2006	
BNR Resolution 1229 – Direct Sales (June 2007)	BNR	6/2007	
Procedure PR-11-000-01 Direct Sale	DNR	6/2007	
Direct Sales Instructions and Appraisal Form	DNR	10/24/2010	
SPS Region Direct Sale Process	DNR		
Lists: SPS Region Direct Sales Agreement Numbers	DNR	11/15/2012	
Lists: 2009–2011	21111	11,10,2012	
Direct Sale interested Parties (list of contacts)	DNR		
List of contract harvest contract clause changes and	DNR	Printed	
email January 2013	Ditit	4/11/2013	
List of contract clause changes May 2013–July 2014	DNR	7/2014	
Load ticket proofs	DNR	9/2014	
Draft Habitat Conservation Plan	DNR	3/1996	
DEIS for the HCP	DNR	3/1996	
FEIS for the HCP (October 1996)	DNR	10/1996	
Incidental Take Permit	Federal	1997	
modernal rake remin	Services/DNR	1337	
Biological Opinion	DNR	1997	
Natural Resources Conservation Area (NRCA)	DNR	Printed 5/9/2011	
Management Plans	DIVIC	1 1111100 0/3/2011	
Natural Area Preserve (NAP) Management Plans	DNR	Printed 5/9/2011	
Washington's Natural Areas brochure	DNR	2009	
Draft Old Growth GIS Layer	DNR	2010	
- Description of the Proposed Layer	DIVIC	2010	
- GIS Tracking Workflow			
- GIS Editing Procedure			
- Old Growth Assessment Document Guidelines			
Website: DNR's Natural Areas Program Information	DNR	Printed 5/2014	
	DNR	9/2011	
Special Ecological Features memo		9/2011	
Forest Practices Activity Map (Barbless U5 - Tahuya) and mitigation email showing species modification;	DNR		
,			
managed stand for Shore Pine. Forest Land Planning Spatial Layer Info w/Public	DNR	11/4/2009	
• • •	DINK	11/4/2009	
Comments Draft Procedure PR14-012-01 Identify and protecting		3/2014	
, , ,		3/2014	
special ecological features West Tiger Mountain NECA Plan	DNR		
West Tiger Mountain NRCA Plan			
Skookum Inlet NAP Plan	DNR	12/2000	
Stavis NRCA Management Plan	DNR	12/2009	
WA DNR State Lands HCP: Instream Habitat Conditions	DNR	12/2001	
and Trends Effectiveness Monitoring	DND	40/0004	
Report: Washington State Lands HCP Effectiveness	DNR	12/2001	

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Title	Author	Date
Monitoring Northern Spotted Owl Silviculture		
West Tiger Mountain NRCA Monitoring Report	DNR	10/16/2014
Skookum Inlet NAP Site Monitoring Report	DNR	10/3/2014
Management Review - FRCD re-structure addressing	DNR	Printed
monitoring: Current Organizational Structure and		10/3/2014
Proposed Change		
Forest Resource and Conservation Priorities and	DNR	Printed
Organizational Structure		10/3/2014

15.5 - Stakeholders identification and consultation

Stakeholders were first identified and were formally consulted prior to the 2012 recertification audit. Consistent with FSC stakeholder consultation requirements (i.e. FSC-STD-20-006) consultation is only required "where necessary", meaning in relation to outside complaints, stakeholder concerns, and controversial activities. However, as WDNR is a public agency, Bureau Veritas solicits stakeholder comments for each audit.

During this audit we met with:

- Rod Fleck Attorney/Planner, City of Forks, WA
- Peter Goldman Washington Forest Law Center, WA
- Kara Whittaker Washington Forest Law Center, WA
- Chris Mendoza Washington Forest Law Center, WA
- Mark Ostwald US Fish and Wildlife Service

In responses to Bureau Veritas's call for stakeholder involvement only two responses were received. The Washington Forest Law Center (WFLC) asked and received a meeting with the audit team where they identified several concerns related to post harvest tree retention, clear cut sizes, the marbled murrelet, spotted owl, riparian buffer areas, and landslides. These concerns have been addressed in this report.

One of the trustees for the state forest lands expressed the opinion that FSC certification was unnecessary and an added expense which drew revenues away from the trusts and the capital improvements which they provide throughout the State's educational system.

15.6 - Interview(s) of involved people met

Angus Brodie Forest Resources Division Manager

Allen Estep Assistant Division Manager-HCP and Scientific

Consultation Section

Lislie Sayers Program Lead, Forest Certification
Doug Kennedy Program Specialist, Forest Certification

David Bergvall Assistant Division Manager-Forest Informatics and

Planning Section

Candace Johnson Assistant Division Manager-Silviculture

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Darin Cramer
Tom Shay
Jed Herman
Product Sales & Leasing Division Manager
Assistant Division Manager-Product Sales Section
Conservation, Recreation & Transactions Division

Manager

Pene Speaks Assistant Division Manager-Natural Areas/Natural

Heritage

Alex Nagygyor Assistant Division Manager – Roads Section

Art Tasker South Puget Sound Region Manager

Doug McClelland South Puget Sound Assistant Region Manager – State

Lands (Asset Management, Recreation, Natural Areas)

Dave Lorence Assistant Region Manager – State Lands (Product

Sales, Land Management, Engineering)

Brian Williams Region Intensive Management Coordinator

Ted Keeley District Manager – Rainier District Lee Roach Forest Manager – Black Diamond Unit

Richard (Ricky) Keller
Justin Gardner
Tyler Traweek
Sam Jarrett
Forester – Black Diamond Unit
Engineer – Black Diamond Unit
Forest Manager – Snoqualmie Unit
Recreation Manager – Snoqualmie Unit

Brian Ballard Engineer – Snoqualmie Unit

Bruce McDonald District Manager – Hood Canal District

Dave Denis Forest Manager – Belfair Unit

Jesse Sims Recreation Manager – Belfair / Hoodsport Units

Scott Sargent District Manager – Black Hills District
Don Melton Forest Manager – Black Hills District

Dave Gufler Intensive Management Forester – Black Hills District

Andrew Reed Compliance Forester – Black Hills District

Contractors:

Steve McKnight - McFarland Cascade, Poles Buyer

Gordon Pogorelc - North Fork Timber, Owner

Jeff Raymond – logger

Mark Raymond - logger

15.7 - Other evaluation techniques

None.

15.8 - FSC trademark use control

WDNR in the past year has received appropriate approval for the use of the FSC trademark on four promotional items.

15.9 - Controversial elements

None observed.

15.10 - Changes since last audit

The Washington Department of Natural Resources, South Puget Sound Planning Unit has not excised or otherwise disposed any forest lands since the last audit in 2013. The size is presently 69,930 hectares (172,801 acres). Ms.

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Lislie Sayers remains the designated contact. While updates are on-going for certain elements or programs there have been no changes in the management structure or system.

15.11 - Surveillance audit closing meeting

A preliminary closing meeting was held in Olympia on October 23, 2014. Lislie Sayers was present. At the meeting we discussed audit findings, next steps, nondisclosure and appeals. The auditor's conclusion was to recommend continued certification; this finding was acceptable to WDNR.

16 - Audit team observations

16.1 - Actions taken in order to answer to the non-conformities from the previous audit

There was one minor non-conformance issued during the 2013 surveillance audit needing addressed.

NC #	NC description	P&C indicator number	Action taken by the entity to close the NC	Closed/ Open	Date of Closure
03	Timber Sale Contracts (both Stumpage and Contract Harvest) do not include specific safety requirements. This is considered a minor deviation as contracts do specify compliance with all applicable requirements and timber harvest contracts include written safety requirements.	FSC-US FM (v.1), P4.2.b	Revised Timber Sale contract and logging plan of operations were provided which clearly specify safety requirements in for operations.	Closed	20 October 2014

Comments: Auditors reviewed the new timber sales contracts and logging plans to ensure that safety requirements were clearly specified and that the contracts were now in use.

16.2 - Action taken in order to answer to previous recommendation

The South Puget HCP Planning Unit is one of nine state land planning units. DNR articulately chose South Puget HCP Planning Unit as the geographic location to pursue FSC certification based on planning efforts. At that time, DNR committed to pursuing FSC certification of lands as planning efforts were

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completed. DNR's original commitment, "The State is committed to FSC certification of all its lands over time as Forest Land planning is completed in the other regions.", can be found in the 2007-2011 FSC Public Summary Report (page 6), last updated February 2012.

During the 2013 surveillance audit, an Observation was made in relationship to 1.6.b. of the FSC-US Forest Management Standard (v1.0; approved by FSC-IC, July 8, 2010): "The South Puget HCP Planning Unit is one of nine state land planning units. It is the first and only unit to be audited for FSC certification because it is the first and only area to have completed a Forest Land Plan. WDNR has publicly, since first becoming certified in 2007, stated they are committed to FSC certification of all their lands over time as Forest Land Planning is completed in the other regions. As a public agency, they are not members of FSC and are not required to certify all their lands. The original commitment statement is unchanged from 2007. Given the Olympic Experimental State Forest Plan may be complete within the next year and the FSC FM standard has changed since WDNR was first certified, a review may be in order to determine the current applicability of the original commitment to certify all forest lands as Forest Land Plans are completed." The above listed Observation can be found in the 2012-2013 FSC Public Summary Report (page 38), last update December 2013.

The Observation received during the 2013 audit was addressed shortly after the opening meeting during the 2014 surveillance audit; October 20, 2014. DNR has updated their commitment in response to ongoing conversations and the above noted Observation received during the 2013 audit. DNR's goal is to manage state-owned lands for economic and ecological sustainability, as outlined with the 2014-2017 Strategic Plan. DNR's goal to sustainably manage forested state trust lands is to manage timber harvest from forested state trust lands in a manner consistent with accepted best practices for sustainability, and demonstrate that through third-party certification.

Currently, all forested state trust lands are certified under the Sustainable Forestry Initiative® program Forest Management Standard. In addition, lands within the South Puget HCP Planning Unit are also certified under the Forest Stewardship Council® US Forest Management Standard. "DNR is committed to maintaining third-party forest certification across all DNR-managed forested State Trust Lands. DNR is working with FSC to generate more direct benefit to trust beneficiaries from FSC certification, which could justify expansion of the program to more forested State Trust Lands." DNR's updated commitment can be found in the Strategic Plan 2014-2017, Update to the Goldmark Agenda, June 2014 (page 14) and on DNR's Forest Certification Website; both publically available.

16.3 - Evaluation of the general conformity level of the entity

The auditors were pleased with the performance of WDNR since the last audit. The WDNR continues to comply with the FSC US forest management standard along with the numerous mandates and policies under which they operate.

Principle 1 – Compliance with laws and FSC Principles

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Forest operations and forest lands are monitored for compliance under the Forest Practices Act. These inspections cover a range of legal and best-practice requirements including monitoring permits, investigating trespass, assessing environmental impacts, health and safety, and wildfire investigation among others. There have been no reports of legal violations related to the trust lands within South Puget Planning Unit over that last five years.

The Washington Forest Law Centre (WFLC) as part of their submission to the audit team were concerned that harvesting on state lands outside of the South Sound Region has negatively affected marbled (Brachyramphus marmoratus) habitat. Their contention is that the harvest of federally designated murrelet habitat is causing the loss of critical habitat and further imperilling the already endangered species in areas of Western Washington. The State has a federally approved Habitat Conservation Plan describing conservation strategies for how the State will restore and enhance habitat for threatened and endangered species such as the marbled murrelet, northern spotted owl (Strix occidentalis caurina), and salmon in conjunction with timber harvest and other forest management activities. This plan takes a landscape approach to multiple species given the relative abundance of habitat on the State lands. This approach does not require the preservation of all habitat, but does protect occupied nesting sites. The US Fish and Wildlife Service (USFWS) approved the State's HCP and they continue to monitor the implementation of the plan and provide public over-site to the process. The audit team met with a member of the Fish and Wildlife Service who provided the assessment that the State remains in compliance with the HCP. All parties (WDNR, WFLC, and USFWS) did agree that the long-term habitat strategy for the marbled murrelet is overdue. The audit team observes that the strategy being developed should be accelerated and completed.

Compliance with this Principle was observed.

Principle 2 - Tenure, use rights and responsibilities.

State trust lands were endowed in the late 1880s when the State was created. Their purpose was to provide capital funding for education in the State. Deeds and other land tenure records are managed by the WDNR's Title and Records Office. WDNR leases a limited amount of land for various uses within South Puget HCP Planning Unit including one grazing lease, communication sites and non-timber forest products (e.g. salal, boughs, etc.). There are no active commercial mineral or gravel leases on the forest. Controls on these activities are exercised through a contract administration and compliance monitoring.

A complaint was filed by the Skokomish Indian Tribe in 2013. The case was dismissed by the District Court in February 2014, was appealed to the Ninth Circuit Court and the appeal was withdrawn in August 2014. The complaint and subsequent legal actions were well documented.

Compliance with this Principle was observed.

Principle 3 – Indigenous people's rights

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The Washington State Department of Natural Resources notifies the Aboriginal Tribes of project or non-project review opportunities through the State Environmental Policy Act (SEPA) standard distribution list. The WDNR has a dedicated tribal liaison whose job is to maintain contact with the tribes. The SEPA Checklist includes questions related to tribal rights and artifacts. A Tribal Summit is held almost annually (for 2014 it is scheduled for November 5-6) where all 29 federally recognized tribes in the State are invited to participate in the Tribal Summit where WDNR programs and activities important to the tribes are discussed.

If a tribal/archaeological site is found during planning or operations, a Site Management Plan is created, when appropriate, and the State Lands Archaeologist would be involved in developing the plan to preserve the value. The Inadvertent Discovery Guidance document gives guidance for ground disturbing activities if a cultural site is discovered.

Principle 4 – Community relations and worker's rights

The Washington State Department of Natural Resources has a rigorous health and safety program. The Commissioner of Public Lands has a goal of improving safety for all WDNR employees. A safety survey of employees was recently completed and based on the results, a safety improvement process plan was developed. Implementation of the plan is ongoing and there are quarterly progress reviews undertaken by management. WDNR also has to comply with all OSHA rules and regulations. State employees have a full benefits package covering extended health care and leave benefits.

All timber sale contracts contain language requiring contractors to meet all safety regulations and to conduct safe operations. In 2013 CAR03 was issued requiring safety measures being specified in timber harvest contracts. A revised timber harvest contract and an updated logging plan of operations was implemented, closing the CAR03. All employees are required to wear proper protective equipment when in the field. Department staff and contractors were observed to be wearing all required safety gear.

WDNR has an extensive public consultation and stakeholder involvement process providing ample opportunities for public involvement. During the forest land planning process, public input on social impacts are solicited from the public. On every operating block, the SEPA process is undertaken which includes assessment of both site specific requirements but also social impacts as well. The public has an opportunity to get input to every forest practices application through the Forest Practices Application Review System (FPARS).

WDNR notifies adjacent land owners of impending forestry activities, particularly timber sales and herbicide applications. They also work with adjacent landowners regarding property lines and boundary line agreements. Landowners are able to express concern directly to employees and managers regarding forest practices activities.

Principle 5 – Benefits from the forest

Sold timber harvests for Fiscal Year 2014 within the South Puget HCP Planning Unit totalled 37,037 MBF (approx. 190,000 m³) slightly above the

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recommended cut of 36,700 MBF (188,000 m³). The volumes harvested are less than annual growth. The HCP describes a desired forest landscape condition which the forest is moving toward, harvesting is critical for ensuring the appropriate balance between various forest attributes (e.g. early successional vs late successional habitats).

The State has several leases for Non-Timber Forest Products (NTFP) which include brush for floral green harvesting (Salal, Sword Fern, and Evergreen Huckleberry) and cultivation of Christmas trees and boughs. The leases specify that the lessee may harvest a product over a fixed area (e.g. 25 acres/10 hectares). The WDNR does not monitor production from these sites in terms of the volume or weight of material harvested as required by indicator 5.6.b. A minor non-conformance was raised (NC 4). An action plan has been developed and is being implemented to address this non-conformance.

Principle 6 - Environmental impact

The Washington State Department of Natural Resources operates under a federally approved Habitat Conservation Plan (HCP); a plan for state trust lands that allows timber harvesting and other management activities to continue while providing for species conservation as described in the Endangered Species Act. The HCP is based upon a landscape and state-wide approach to species habitat restoration and enhancement.

The Washington Forest Law Center (WFLC) expressed several concerns with regard to the condition of northern spotted owl habitat on the South Puget HCP Planning Unit forest and other areas in the State. The HCP was approved by the federal Department of Fish and Wildlife (USFWS) and the National Marine Fisheries Service (NMFS); it expresses a landscape approach knowing that critical habitat is not static and can be managed for across the west side of the State. This conservation management allows for some loss/change in habitat as other areas will develop into habitat. The WFLC's preferred approach is to protect all important habitat elements. Owl habitat includes both nesting sites (often referred to as owl circles) and dispersal habitat. In discussion with experts at the US Fish and Wildlife Service, auditors were told that landscape habitat thresholds were being met and that the plan on State lands was being effectively implemented.

The Washington Forest Law Center was concerned that the State was not using the best technology for identifying groundwater recharge areas and glacial deep seated landslides. The WFLC would like to see the use of drilled bore holes for testing stability on any at risk sites. The WDNR has been mapping landslide hazard for several decades. The entire forest managed by the WDNR within the South Puget HCP Planning Unit has recently been mapped using a remote sensing technology (LIDAR) which further enhances their capability to identify hazards. Harvest operations in potentially hazardous areas are only undertaken after geological assessment has been undertaken by a licensed geologist. The current approach appears reasonable to audit team.

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The Washington Forest Law Center expressed concern with the state of the Riparian Management Zones (RMZ). They acknowledged that the State requirements for streamside buffers were more stringent than the FSC-US Forest Management Standard. Concerns were expressed that RMZs did not meet standards (i.e. were too thin) and that harvesting within them was excessive. The audit team examined five sites where RMZs were present. In all cases, buffer widths met or exceeded the State requirements. In only one case had harvesting occurred within the RMZ; the harvest was extremely light and the RMZ remained intact (Figure 1).



Figure 1. Riparian Management Zone on the Karisrun 3 block. Harvesting was very light and only on the edges of this RMZ.

A Westside Old Growth Habitat Index (WOGHI) has been completed and is applied when there is a moderate to high likelihood of old growth forests being

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part of a timber sale. The WOGHI is a screening tool to help identify potential old growth that then needs to be field verified. Old growth stands once identified are moved into permanent reserves. Sites larger than five acres are protected. The South Puget HCP Planning Unit was heavily logged in the past and approximately 300 acres of older forest remain and are protected.

The HCP defines leave tree requirements. WFLC was concerned that the required levels of retention were not being met. They did a precise count and found only 7% retention in some areas. State figures for retention in the South Puget Planning Unit average well above the FSC requirements. The difference is that the WFLC counted only trees within the harvest areas and not those surrounding forest areas such as riparian zones, uncut peninsulas, and boundary areas. The audit team visited ten sites where variable retention harvesting or clear cutting had taken place. Tree retention was seen to be adequate to excellent on all sites (Figure 2).



Figure 2. Post harvest tree retention on Karisrun 3.

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 aces or less however; there are a few individual harvest blocks that exceed 60 acres. The Policy for Sustainable Forests, 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 60 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.

Principle 7 – Management plan

Principle not evaluated.

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Principle 8 – Monitoring and assessment

The State has a detailed process for monitoring its forests and forest operations. They monitor implementation, compliance, and effects through three different programs. Compliance foresters monitor all timber sales and silvicultural operations. Detailed monitoring records are available from the State along with annual summary reports.

The State has a detailed forest resources inventory system which provided all the required information for the forest management plan and ongoing operations. A new inventory system using remote sensing data and field sampling is being developed. The new system is expected to be online in 2015.

State lands are monitored for forest fires by the State, while the State and federal governments monitor pests. State monitors landslides and blowdown events. All occurrences are mapped and catalogued. The State monitors RTE (rare, threatened, and endangered) species through the HCP process. The State's Planning & Tracking system has reporting capability to cover these items. The implementation monitoring program covers many of these items.

The State has chain of custody procedures in place to ensure the traceability of its certified wood. Upon examination of the load tickets, which accompany certified wood to purchasing mills, it was found that tickets still reference "FSC Pure" rather than "FSC 100%". A major non-conformance was issued as this requirement was to be implemented in 2012 and the requirement was known to the State but not implemented.

Principle 9 – Maintenance of high conservation value forests

A well develop program is in place and codified in the Natural Areas Preserve Act (RCW 79.70) and other planning efforts such as the HCP. The natural heritage database is the primary mechanism used to query candidate HCVs. Candidate HCVs can be identified internally or externally by stakeholders. HCVs fall into several categories including designated NRCA (Natural Resource Conservation Areas) and NAP (Natural Area Preserves); old growth communities, endangered species and rare plant communities. In total HCVs covers thousands of hectares over dozens of sites.

Given HCVs are designated for varying reasons, they can overlap. Summaries are available in several formats and documents, all of which are publicly available and posted on the WDNR website. Quarterly meetings are also held with the Natural Heritage Advisory Council.

Management plans are in place for all HCVs, be they NRCA, NAP, components of the HCP or other designations. Specific direction is provided with respect to permitted uses and activities. Any prescribed or proscribed activities are designed to maintain or enhance HCVs attributes. Uses can vary widely and depend on the values being protected or enhanced.

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Compliance and effectiveness monitoring exists and is robust for certain HCVF elements. In NRCA and NAP's, monitoring program objectives and standards are described. WDNR personnel and cooperators do visit sites frequently to monitor the sites and activities; reports of monitoring results were provided at the closing meeting.

16.4 - Eventual changes in the scope of certification

None expected in the near term.

17 - Proposals regarding the certification decision

17.1 - Description of new observations

The long-term marbled murrelet habitat strategy for Western Washington should be completed (1.6.b)

17.2 - New Minor Non-Conformities

One new minor non-conformity has been issued.

N°	Minor Non-Conformity	Proposed date of implementation	Requirement number
04	Non-Timber 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.	October 22, 2015	FSC-US FM (v.1), P8.2.b

Non-conformance 4 was raised when it was realized that the State was not keeping track of the amount of NTFP being harvested. They were only tracking the area. The state is currently working on systems to capture this information.

17.3 - New Major Non-Conformities

N°	Major Non-Conformity	Proposed date of implementation	Requirement number
05	Load tickets for the timber harvested use the claim FSC PURE Rather than the proper claim of FSC 100%.	January 22, 2015	FSC-STD-40-004 v2.1, 6.1.2

Non-conformance 05 above was closed on January 20, 2015 based upon the presentation of evidence that the load tickets are being updated, while in the interim foresters will be updating existing load tickets by hand.

17.4 - Conclusion of the audit team

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The Washington State Department of Natural Resources – South Puget Sound HCP Planning Unit continues to manage the forest land to a very high standard and continues to meet the requirements for FSC certification. Continued certification is recommended.

18 - Certification decision

Regarding lead auditor conclusions and technical review, the HUB decides that the FSC FM Certificate of Washington Department of Natural Resources remains valid.

Issued 1 February 2015, reviewed 23/02/2015

FM certification technical reviewer,

Lead Auditor,

Brier Callagha

Florian Terrière

Brian Callaghan

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19 - Appendices

19.1 - Responses to stakeholders

Date	Ref. Rema rk	Remarks Received	FSC Criteria- Indicator	Answer Client	Answer Lead Auditor	Answer Bureau Veritas Certification
07 Nov 2012	1	"Our agency is satisfied with performance of the HCP, including the South Puget Sound land management. Forest-land habitats for all the covered species of anadromous fishes under our agency's purview are being well conserved by the HCP." He did express some concerns over the Headwaters Conservation Program: "To my knowledge, there has been little action by WA-DNR on this matter since that time (2009)."			Thank you for your comment	

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Date	Ref. Rema rk	Remarks Received	FSC Criteria- Indicator	Answer Client	Answer Lead Auditor	Answer Bureau Veritas Certification
11/26/2012	2	One comment acknowledged how important the revenues from trust lands are to many communities throughout the State. He was concerned with the costs of FSC certification, especially in light of the fact that State does not get a premium for certified wood			Thank you for your comment	
08/29/2013	3	City of Forks is very supportive of WDNR programs in this rural community.			Thank you very much for your comments,	
09/26/2013	4	I am a Prison Superintendent for the Washington State Department of Corrections (WA DOC). In addition to my position I am also the interagency liaison for WA DOC, in partnership with the Washington State Department of Natural Resources (WA DNR).WA DOC has 4 prisons, which provides offender labor to WA DNR for purposes of			Thank you very much for your comments, they are very helpful in describing some other vitally important programs WADNR takes on that few people know about.	

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Date	Ref. Rema rk	Remarks Received	FSC Criteria- Indicator	Answer Client	Answer Lead Auditor	Answer Bureau Veritas Certification
		siviculture, resource protection, wildfire response, and miscellaneous projects throughout the state; inclusive of state trust lands and many other venues. Our partnership is vital; supports forest health, protects environments and in emergencies Wildfire response protects lives, homes, and land. Offender workers are trained in these technical domains by DNR staff, in accordance with national standards. Additionally offenders earn a wage, learn basic job skills around attendance, teamwork, and interpersonal skills. Please feel free to contact me with any questions you might have. Thank you for the opportunity to comment.				
October 21, 2014	5	Met with the Washington Forest Law Center (WFLC) who represent a coalition of Washington stakeholder groups. They had several concerns: 1) Inadequate leave tree retentions 2) Harvesting Riparian zones 3) Concerns on marbled	many	Listened to the stakeholder group and is willing to provide factual data to support compliance with FSC-US	Audit team committed to looking into the issues identified and respond through the audit report.	

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Date	Ref. Rema rk	Remarks Received	FSC Criteria- Indicator	Answer Client	Answer Lead Auditor	Answer Bureau Veritas Certification
		murrelet on other state lands 4) Landslides 5) Northern spotted owl habitat		Forest Management Standard, the HCP, and other laws.		
Nov 16, 2014		A trustee from Forks was very concerned with the costs of FSC certification and the lack of tangible benefits it brings to the forest and the communities which rely on its revenues. He feels that the certification is political rather than pragmatic.		Understand the position of the trustee from Forks.	Understand their frustration at the lack of an economic benefit arising from FSC Certification	