



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

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Contract Number	18650854

Certification Audit:		Re-Certification Audit:	<b>X</b>	Surveillance Audit:		#	Scope extension audit:	
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**Audit Summary**

**Introduction**

This report documents the 2023 renewal audit of Washington State Department of Natural Resources (DNR) forest management program to the requirements of the SFI® 2022 Forest Management Standard – Section 2. The audit was undertaken May 22<sup>nd</sup>-26<sup>th</sup>, 2023.

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

The audit was led by Sarah Bros, R.P.F., a professional forester with over 30 years' experience in forestry in Canada and accompanied by Greg Bassler, M.S., SAForester, a professional forest engineer with nearly 40 years of experience in Idaho.

**Audit Scope, Objectives, and Process**

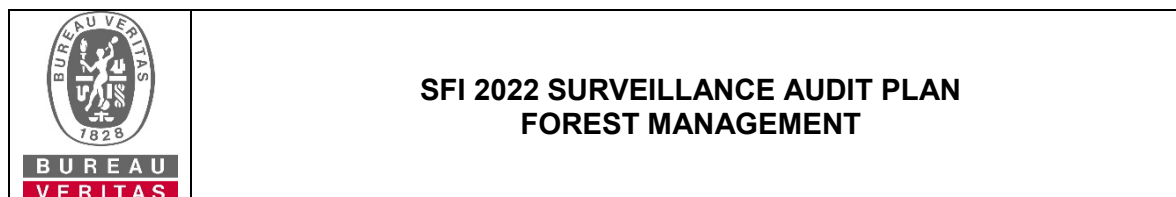
The scope of the renewal audit is DNR's forest management program in western and eastern Washington. The objective of the audit is to verify Washington DNR's conformance to the requirements of the SFI® 2022 Forest Management Standard – Section 2. All objectives and performance measures were audited as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

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

The opening meeting of the audit was held at the Washington Department of Natural Resources field office in Forks, WA on Tuesday, May 22<sup>nd</sup>, 2023 at 2 pm. Representatives from DNR attended the meeting in-person and virtually. The scope of the audit and logistics of the audit plan were discussed as well as the schedule for the audit. Field sites to be visited during the audit were confirmed. The closing meeting time and location was confirmed for May 26<sup>th</sup>, at 4:30 pm in the DNR Arlington Work Center.

## Audit Plan

An audit plan was prepared and submitted to DNR in advance of the audit. One half-day with two auditors (equivalent to 1 person-day) was spent on document review and 4 days (two audit tours each day, equivalent to 8 person-days) were spent visiting field sites. A copy of the audit plan (see below) is retained on file at Bureau Veritas office in Houston, Texas.



<b>Company</b>	Washington State Department of Natural Resources		
<b>Contract Number</b>		<b>Date:</b>	April 21, 2023
<b>Audit Type</b>	Renewal	<b>Audit Dates:</b>	May 22-26, 2023
<b>Standards</b>	SFI 2022, Section 2 Forest Management		
<b>Audit Team:</b>	Sarah Bros, R.P.F. (Lead), Greg Bassler (auditor)		
<b>SFI/EMS Representative:</b>	Tracy Petroske		
<b>Opening Meeting:</b>	<b>Date:</b>	May 22, 2023	
	<b>Time:</b>	14:00 PST	
	<b>Place:</b>	DNR office, Forks, WA	
<b>Closing Meeting:</b>	<b>Date:</b>	May 26, 2023	
	<b>Time:</b>	16:30 PST	
	<b>Place:</b>	DNR office, Arlington Work Center	
<b>Audit Scope:</b>	SFI FM: Forest Management in Washington State		
<b>Verification Indicators</b>	SFI 2022 Objectives: All objectives		

### Auditor assignments:

Sarah – odd number objectives

Greg – even number objectives

### Audit Objectives – SFI Certification shall establish:

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

### Procedures and Protocols Used:

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

***Audit schedule sent to client 14 days prior to the audit.***

***This schedule is flexible and adaptive so it can/may/will be altered as necessary.***

## Audit Schedule

### Date: Monday, May 22, 2023

Time	Activity	BVC Repr.	Company Repr.
13:30	Opening Meeting – Audit Objectives, potential findings, appeal procedures, nondisclosure, safety	Bros, Bassler	Petroske
14:00	Document Review – DNR Forks office (411 Tillicum Lane, Forks, WA)	Bros, Bassler	Petroske
16:00	Debrief – any initial findings and logistics for site visits	Bros, Bassler	Petroske
16:30	Depart site		

### Date: Tuesday, May 23, 2023

Time	Activity	BVC Repr.	Company Repr.
08:00	Meet at the DNR office (411 Tillicum Lane, Forks, WA)	Bros, Bassler	Petroske
08:15	Depart for field sites – Coast/Ozette region & OESF	Bros, Bassler	Petroske
16:30	Return from field	Bros, Bassler	Petroske
17:00	Depart for Port Angeles		

### Date: Wednesday, May 24, 2023

Time	Activity	BVC Repr.	Company Repr.
08:00	Meet at the DNR office (411 Tillicum Lane, Forks, WA)	Bros, Bassler	Petroske
08:15	Depart for field sites – Straits region/eastern half	Bros, Bassler	Petroske
16:30	Return from field	Bros, Bassler	Petroske
17:00	Depart for Burlington		

### Date: Thursday, May 25, 2023

Time	Activity	BVC Repr.	Company Repr.
08:00	Meet at the DNR office (919 N. Township St., Sedro Woolley, WA)	Bros, Bassler	Petroske
08:15	Depart for field sites – NW region	Bros, Bassler	Petroske
16:30	Return from field	Bros, Bassler	Petroske
17:00	Depart site		

### Date: Friday, May 26, 2023

Time	Activity	BVC Repr.	Company Repr.
08:00	Meet at the Office (919 N. Township St., Sedro Woolley, WA)	Bros, Bassler	Petroske
08:15	Depart for site visits – NW region	Bros, Bassler	Petroske
15:30	Return to office; compile audit findings	Bros, Bassler	Petroske
16:30	Closing Meeting – Arlington Work Center (208 Southwest Avenue, Arlington, Wa)	Bros, Bassler	Petroske
17:00	Depart site		

Documents to be reviewed:

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

**Company Information**

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

**Multi-Site Requirements**

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

For multi-site certifications, a site sampling method is generally used. The number of sites to be audited for renewal audits is equal to the square root of the number of sites x 0.8. Based on this sampling method, two of the six regions (see below) are audited each year, on a three-year rotation. The surveillance audit plan for 2023 included field tours of the Olympic and Northwest regions. Each region or site is audited on a three-year basis and these two regions were last audited in 2019. DNR is in conformance with all multi-site requirements.

Multi-Site	X	Group Certification	
<b>Sites</b>		<b>Sites Audited During this Event</b>	

Olympia, WA (Central Office)	
Northeast Region	
Northwest Region	X
Olympic Region	X
Pacific-Cascade Region	
Southeast Region	
South Puget Sound Region	

## Audit Results

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

These policies, regulations, and planning documents include objectives and/or consideration for habitat, RTE species management, water and wetland protection, forest conditions, riparian, roads, recreation, cultural values, fish, aesthetics, adaptive management, air quality, and carbon sequestration while recognizing DNR has a fiduciary duty to generate revenue from these lands. DNR-managed state trust lands provide revenue to support public institutions such as construction of public K-12 schools and state universities. In addition, DNR-managed state forest lands provide funding services in many counties and contribute to the state General Fund.

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

Long-term sustainable harvest levels are determined every 10 years. Both the eastern and western side of the Cascades are currently revising their sustainable harvest for 2025-2034. The Remote Sensing-Forest Resource Inventory System (RS-FRIS) is used in the calculation of the sustainable harvest level, is updated annually with forest inventory information, and is also updated at least every 2 years with forest change data (e.g., reforestation). Growth and yield data and analysis is updated prior to sustainable harvest calculations.

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

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

**Objective 2 - Forest Health and Productivity:** DNR uses a variety of silvicultural systems to manage trust lands. The systems used include Variable Retention Harvest (VRT), shelterwood, thinning, and even-aged harvest systems. All harvest areas are regenerated within 2 years of harvest completion. Legally, reforestation must meet a minimum stocking of 190 trees/acre at year 5. Currently, DNR plants at 300-400 trees/ac. Species planted include Douglas fir, Western Larch, Western White Pine, Spruce, Ponderosa Pine, Western Red Cedar and recently, Red Alder. Stock survival surveys are conducted the year after planting, and vegetation competition surveys are 2

years post-plant. When reforestation efforts do not meet the minimum stocking levels, the site is replanted. DNR has a procedure for surveying young stands that is aligned with the Forest Practices Act procedures for surveying young stands. Free to grow surveys are conducted at year 8 post plant. All survey results are recorded in the LRM and the new information is updated in RS-FRIS.

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

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

DNR has detailed soils maps that identify soil types and unstable soils, and have procedures to minimize impacts to soils during harvest activities. Skid trails viewed during the audit were consistent with direction to maintain soil productivity and health. DNR is required to leave 8 trees/acre for retention during harvesting.

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

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

**Objective 3 - Protection and Maintenance of Water Resources:** Forest management activities in Washington state are subject to the state Forest Practices Act and associated rules including harvesting, roads, water protection and best management practices. The DNR Forestry Handbook outlines all procedures, processes, guidelines and supporting documents related to forest management activities. As an example, there are procedures for protecting water courses during harvesting or road building and rules around operating in wet weather on slopes. Timber sales and silviculture contracts include applicable procedures or processes from the Forestry Handbook.

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

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

The RS-FRIS contains data on forest cover based on LiDAR, and air photos supplemented with ground-based plot data. DNR uses this data to manage habitat types used by RTE species. DNR has set aside special management zones, removing these areas from timber sales to meet habitat

objective strategies. All proposed timber harvests are reviewed by regional wildlife biologists prior to going up for auction. All foresters and/or contract administrators interviewed by the auditors were well versed in, for example, identification of old growth characteristics. Regional biologists will, when required or requested, assess timber sale areas for special habitat types.

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

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

The Natural Areas Preserves and Natural Resource Conservation Areas protect “outstanding examples” of RTE species habitats and threatened native ecosystems. These areas provide educational and research opportunities for the public. The Olympic Experimental State Forest (OESF) is a “working forest and living laboratory”. It is the only state forest where DNR exercises operational trials that would not normally conform to the Forest Practices rules. For example, auditors viewed an operational trial in the OESF called the “T3 Watershed Experiment” in which a variety of operational prescriptions are being applied and analyzed with the intention of enhancing sustainability of critical ecosystems.

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

The maximum harvest block size is 100 acres (40 ha) for even-aged forest management. This size limit can be exceeded for fire salvage or forest health concerns. There are no block size limits for shelterwood or thinning harvest prescriptions.

DNR has a well-organized and diverse recreation program to satisfy the variety of outdoor enthusiasts. DNR’s recreation managers and staff work with several recreation groups (e.g., ATV clubs) to maintain and assist with the construction of trails. DNR partners with programs such as youth corps to build new recreation trails. Auditors viewed both motorized ATC, dirt bike and 4X4 trails bike trails, and non-motorized mountain bike, horseback riding and hiking trails during the audit. DNR also manages primitive campsites on state trust forest lands. Auditors were impressed with the creative use of a campground host, a volunteer who is present year-round to answer questions and help ensure camper safety and adherence to rules. Many DNR roads and recreation trails are freely accessible, but some parking areas require the daily or annual purchase of a Discover Pass. Auditors noted DNR signage at recreational parking areas that explain the link between sustainable forest management, revenue for the community, and wildlife management. Many recreational trails provide opportunities for bird watchers as well.

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

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

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

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

**Objective 8 - Recognize and Respect Indigenous People's Rights:** The Washington state Department of Archaeology and Historic Preservation is responsible for implementing Executive Order 2102, which emphasizes tribal consultation. DNR meets regularly with Tribes in the state to discuss issues and concerns. DNR has a comprehensive program related to tribal relations, including multiple policies and procedures. Staff are offered regular training on tribal relations. There are 3 archeologists on staff and approximately 50 certified Cultural Resource Technicians (CRTs). All timber sales reviewed during the audit contained correspondence with affected tribes. Auditors heard that staff are encouraged to reach out to tribes early in the timber sale planning process. Documentation provided to the auditors demonstrates that, during planning for the HCP EIS, tribes were provided opportunities to review the EIS. Formal opportunities are provided through the SEPA process. Auditors observed examples where culturally modified trees used for bark stripping were protected during a timber sale. DNR worked with the affected tribes to protect identified trees as well as additional trees suitable for the cultural practice of bark stripping.

**Objective 9 - Climate Smart Forestry:** The Forest Health Strategic Plan includes a goal to make the state forests more resilient to climate change. In 2016, legislation was passed that enabled development of the Forest Health Strategic Plan for eastern Washington. The Plan draws on the expertise of 32 tribes, external organizations, universities, state and federal agencies, and other science experts to develop a plan of action.

**Objective 10 - Fire Resilience and Awareness:** DNR launched its prescribed fire program in 2021 aimed at creating a more resilient future forest. The prescribed fire program falls under DNR's Forest Resilience Division. DNR views prescribed fire as a critical tool in achieving objectives in the Forest Health Strategic Plan: Eastern Washington. The prescribed fire program includes training to increase the number of prescribed burn fire managers.

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

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

Timber sale and silviculture contracts contain language requiring conformance to state laws and regulations. For example, timber sale contracts require all bidders to be qualified under the



Washington State Contract Loggers Association. Contracts also include a clause regarding no harassment. Washington state has equal pay and opportunities legislation. Additionally, Washington state has a Human Rights Commission that enforces the state law against discrimination. DNR has an equal opportunity and non-discrimination policy (PO 01-001) that delineates workers' rights.

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

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

DNR has policies and procedures for regeneration assessments, growth and drain assessments, best management practices, and compliance regulations under the Forest Practices Rules. DNR has a Landowner Assistance tab on their website and programs to assist family forest owners. DNR reports annually to the Board of Trustees on the social, cultural, and economic benefits of the state trust lands. Under the HCP, DNR undertakes monitoring of landscape-level biodiversity assessments to meet objectives in the HCP.

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

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

DNR requires qualified logging professionals accredited through the Master Logger Program (MLP). This program is administered through the Washington State Contract Loggers Association. The program includes 4 days of coursework including silviculture, ecology, health and safety, and compensation. Master Loggers must maintain valid first aid certification and complete continuing education credits annually.

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

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

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

research projects and conservation programs have helped further conservation funding and funding for other programs.

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

The DNR website main page has a “Contact Us” tab that allows the public to comment or submit a complaint to DNR. While on the audit, a member of the recreation public stopped to compliment DNR staff on the system of bike trails in the state.

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

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

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

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

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

## Findings

**Previous non-conformances:**

None.

**Non-conformances:**

None.

**Opportunities for Improvement:**

1. **3.2.1 Monitoring of overall best management practices implementation.**

Auditors noted an older timber bridge deck on the Block C-2700 Haul Road which could allow fines to enter the stream. DNR should continue to monitor bridges during active haul for BMP implementation related to the protection of water quality.

**Notable Practices:**

1. **4.1.4 Certified Organizations shall individually and/or through cooperative efforts such as SFI implementation committees, participate in or incorporate the results of credible state, provincial, or regional conservation planning and priority-setting efforts to conserve biological diversity and consider these efforts to conserve biological diversity and incorporate the results of these efforts in forest management planning. Credible priority-setting efforts include state and provincial wildlife action plans, state forest action plans, relevant habitat conservation plans or provincial wildlife recovery plans, indigenous planning processes or ecoregional plans.**

Auditors issued a notable practice (NP) under this objective for the forest management work conducted by DNR under the Good Neighbor Authority (GNA) agreement with the US Forest Service (USFS). The agreement allows DNR to assist the USFS with forest management on USFS forested lands to meet broader objectives for critical habitat management and forest resilience in the state and at a national level. Revenue from GNA timber sales within a national forest goes into the state's Natural Resources Federal Lands Revolving Account. That account can be used to restore watersheds and make other habitat improvements in the same national forest.

Since 2017, when DNR and the federal government signed their first GNA agreement, DNR has brokered GNA agreements with every major national forest in the state. The agreement allows DNR to help accelerate work in federal forests that reduces wildfire risk to habitat, communities, and state trust lands, creates greater forest and watershed resilience against drought, insects, disease, and wildfire, and expands economic opportunities in rural areas where businesses perform this much-needed work across state and federal lands.

For example, DNR's Federal Lands Program has been working on GNA projects on the Olympic Peninsula since 2020. Projects include commercial thinnings, fish habitat/passage projects, road improvements and engineering, surveys, trash removal, invasive species control, and more. Since 2020, there have been 4 Olympic District commercial thinning projects under contract with a total of about 1200 acres, a sold volume of approximately 22 million board feet, and revenue totaling about 2.9 million dollars, which has been used to fund further restoration on the Olympic Peninsula. Currently, Olympic District has six more planned commercial thinning projects under agreement with Olympic National Forest through fiscal year 2029, plus many more noncommercial restoration projects in the works.

2. **15.1.2 Appropriate contact with local stakeholders over forest management issues through state, provincial, federal, or independent collaboration.**

Auditors were impressed with how DNR has done an outstanding job collaborating with local stakeholders on forest management issues. For instance, in the Northwest region, staff spent three years of collaborative effort developing the Baker to Bellingham Non-Motorized Recreation Plan, a guiding document for sustainable recreation experiences in Whatcom County for the next 15 years.

For motorized recreation, the Reiter Foothills Forest is a hub for motorized recreationists, complete with 4x4, ATV, and motorcycle trails plus areas designed for trials bikes. In 2010, the agency adopted a Reiter Foothills Forest Recreation Plan to prioritize long-term recreation opportunities that are consistent with the agency's obligation to protecting habitat for wildlife and generating revenue. DNR developed this plan in partnership with a broad range of recreationists, representatives from Wallace Falls State Park and Snohomish County, and the surrounding Gold Bar, Index, Monroe and Sultan communities. During active logging operations in Reiter Hills, DNR works closely with Foothills users to maintain continuous access to the greater area for safe recreation. DNR oversees

monthly community work parties to maintain the area, and hold monthly Reiter Foothills Public Forum meetings which are open for all to attend.

In general, the region has made significant efforts to engage with stakeholders in order to educate on DNR Trust Land Management and to better understand the concerns that stakeholders may have in that regard. Region staff have participated in countless field visits with engaged community members and elected officials, and posted educational signage in high-use areas such as Blanchard Mountain. Furthermore, staff have coordinated or participated in many outreach events such as the Whatcom Woman in Timber Tour, Fifth Grade Conservation Tours, and programs where teachers receive STEM credits such as “Engaging Communities in Forestry Education” put on by the Pacific Education Institute through funding from SFI.

**Logo/label use:**

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

**SFI reporting:**

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

**Review of Previous Audit Cycle**

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

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

**Conclusions**

A closing meeting was held on May 26<sup>th</sup> at 4:30 pm in the Arlington Work Center. Auditors thanked DNR staff for their efforts on the audit. The Lead auditor gave an overview of the audit week specifically what audit work was completed to date. Each auditor spoke to their observations during the week and presented any non-conformances, OFIs or notable practices. There was one OFI related to the bridge deck in Block C-2700 Haul Road. There were two related notable practices related to the Good Neighbor Authority agreement work done on behalf of the USFS and for work done to collaborate with local stakeholders on forest management issues. The Lead auditor concluded the meeting with a recommendation for continued certification.

**SEE SF61(s) FOR AUDIT NOTES**