

# FSC™ CERTIFICATION SYSTEM

## FOREST MANAGEMENT CERTIFICATION SURVEILLANCE AUDIT n°4 Public REPORT

Report finalisation date: November 23 2016  
(updated March 1 2017)

Washington Department of Natural Resources

South Puget HCP Planning Unit  
*(Doug Kennedy, Douglas.kennedy@dnr.wa.gov)*

Forest location(s): Washington USA

Certificate registration code: BV-FM/COC-080501

Date of issue: June 25, 2008

Date of expiry: **May 13 2018**

Main Evaluation :	10-12 December 2012
Surveillance 1	21 -23 October 2013
Surveillance 2	20-23 October 2014
Surveillance 3	2-5 November 2015
Surveillance 4	17-20 October 2016

## BUREAU VERITAS CERTIFICATION

[www.certification.bureauveritas.fr](http://www.certification.bureauveritas.fr)

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Document ref.: XXXXXXXXXXXX version XX

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## 1 - Description and background of the applicant forest entity

### 1.1 - General description and identification

Forest Management company			
Commissioner of Public Lands	Mr. Peter Goldmark		
Address	1111 Washington St. SE, Box 47014 Olympia, WA 98504-7016.		
Telephone	360-902-1283		
E-mail	Douglas.kennedy@dnr.wa.gov		
Web site	<a href="http://www.dnr.wa.gov">www.dnr.wa.gov</a>		
Contact person (responsible) for FSC certification	Doug Kennedy		
FSC trademark responsible	Doug Kennedy		
Activity	forest management only		
Annual turnover:	\$ 11,267,260.00 USD		
Category of forest management	Natural forest		
Number of forest workers (including contractors):	Forest field activity	Number (male)	Number (female)
		56	16
	Administrative/office activity	Number (male)	Number (female)
		11	11

The Washington State Department of Natural Resources (WDNR) manages state forest lands for a variety of public trusts which fund state-wide school construction, universities, state institutions, and county services. Forest management is directed by the Policy for Sustainable Forests, and WDNR's Habitat Conservation Plan (HCP), 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.

## 2 - Scope of certificate

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

### 2.1.1 - Certificate

	Single FMU (YES/NO) <sup>1</sup>	Multiple FMU (YES/NO)	Group (YES/NO)
Normal Certificate	Yes		
Small SLIMF Certificate			
Low intensity SLIMF Certificate			

### 2.1.2 - Description of FMUs

Classification	Number of FMUs	Total forest area (ha <sup>2</sup> )			
		Privately managed	State managed	Community managed	Total
Less than 100 ha in area					
100 – 1000 ha in area					
1000 – 10 000 ha in area					
More than 10 000 ha	1		71,272 (176,041 ac)		71,272 ha (176,041 ac)
Meeting the eligibility criteria as SLIMF					
<b>TOTAL</b>			<b>71,272 ha</b>		<b>71,272 ha</b>

The area presented in this table resents an apparent increase of 6596 ha from the area reported in 2015. In fact this increase is based on better reporting technologies providing a more accurate measure of the various parcels in the South Puget HCP unit. There have been no significant land purchases or sales by the WDNR in the past year.

## 2.2 - Product categories and main commercial timber:

<sup>1</sup> Fulfil where the answer is correct

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

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**List of Timber Product Categories available for sale as FSC-certified products**

Trade Name	Species (botanical name)	Product Type/ Nature (round wood, pulpwood,...)	Selling mode	FSC product claim
Round wood logs	Psuedotsuga menziesii Alnus rubra Thuja plicata Tsuga heterophylla Abies amabilis Acre macrophyllum Populus trichocarpa Abies procera Picea sitchensis Pinus contorta Pinus monticola	Round wood logs W.1.1	FOB	FSC 100%
Other non timber forest products -	Psuedotsuga menziesii Alnus rubra Thuja plicata Tsuga heterophylla Abies amabilis Picea sitchensis. Pinus contorta Pinus monticola Gaultheria shallon	Conifer boughs, N10	FOB	FSC 100%

The South Puget HCP planning areas' primary forest products are logs of Douglas fir, Western hemlock, red cedar, and grand fir. Harvested roundwood can claim a FSC 100% claim. There is a relatively small seasonal business where boughs are harvested as floral greenery also some salal is harvested.

## 2.3 - Description of the audit program.

### 2.3.1 - Surveillance audit schedule and last survey audit schedule

#### Date: October 17, 2016

Time	Activity	BVC Repr.	Company Repr.
09:00 AM	Opening Meeting	BC JS	DKHY
09:30 AM	WA DNR update	BC JS	DKHY
10:00 AM	Document Review & CAR Closure	BC JS	DKHY
12:00 PM	Lunch	BC JS	DKHY
01:00 PM	Document Review continued	BC JS	DKHY
04:30 PM	Daily debrief	BC JS	DKHY
05:00 PM	Depart site		

#### Date: October 18, 2016

Time	Activity	BVC Repr.	Company Repr.
07:30 AM	Depart Olympia	BC JS	DKHY
08:00 AM	Field Tour – Elbe (Callaghan) - Belfair (Stangell)	BC JS	DKHY
04:00 PM	Return Olympia	BC JS	DKHY
04:30 PM	Daily debrief	BC JS	DKHY

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Time	Activity	BVC Repr.	Company Repr.
05:00 PM	Depart site		

**Date: October 19, 2016**

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

**Date: October 20, 2016**

Time	Activity	BVC Repr.	Company Repr.
08:30 AM	Arrive at WaDNR	BC JS	DKHY
09:00 AM	Document Review/Stakeholder Interviews	BC JS	DKHY
10:00 AM	Compile Findings (auditors rendezvous)	BC JS	DKHY
11:30 AM	Closing Meeting	BC JS	DKHY
12:00 PM	Depart		

Statement of the total person days spent for assessment:

activity	Nb of man/day
Pre-evaluation or preparatory work	
Audit activity on field	7
Stakeholder consultation	1
Report writing	1
<b>TOTAL</b>	<b>9</b>

**2.3.2 - Clear description of the sampling system employed to select FMUs or sites for evaluation and RATIONALE for their selection**

During the audit 24 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. During the audit 24 sites were visited, which exceeded the minimum requirement of 16 based upon renewal audit sampling intensity. The table below provides information on the findings at each site.

Date	Auditor	Site	Comments & Findings
------	---------	------	---------------------

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Date	Auditor	Site	Comments & Findings
10/18/16	Stangell	Winch VRH & VDT U.2	Jesse Sims, rec manager -- Tahuya Green Mountain Focus Group has been in place since 1994, comprehensive management plan is complete in 2013. New trail proposed for 4x4s, utilizing volunteer labor to build 3 miles of additional 4x4 trail with technical features to add interest to the trail system. Nathan McReynolds, Belfair unit manager - sale has sold, no active operations.
10/18/16	Stangell	Winch scheduled harvest U.3	Nathan -- RMZ thinning -- Sale has sold, no operations to date, prework scheduled for Friday. Purchaser to mark buffer to be thinned.
10/18/16	Stangell	Madrona Heights U.2	74 acres harvested 2014, ground chemical site prep July 2015, planted Feb 2016. Initial survival survey completed 10/3/16, 341 tpa with good survival. High stumped perimeter area of root rot, planted cedar and white pine in these areas. Noxious weeds -- have own truck to spray roadside brush, must have at least 1 licensed person on the truck, closed system, no mixing. Chemical storage shed in Enumclaw and Tumwater. Noxious weeds are Scotch broom, Japanese knotweed, some tansy.
10/18/16	Stangell	Twin Goats U.3	Bill Heymann, District Engineer -- Bridge replaces 30 inch pipe on Type 3 stream, installed summer 2016. Bridge raised up to shorten length, gravel deck on bridge, no issues.
10/18/16	Stangell	Black Cat U. 1	Dave Guffler, intensive management forester, 22 acre unit, harvested 2014, ground chemical site, prep July 2015, planted Feb 2016. Initial survival survey completed, good survival, seedlings look good, no concerns. Discussed process for stocking surveys, timing.
10/18/16	Stangell	Green Simon U. 1	59 acres VRH, cable logged winter 2016, unit complete, located on Green Mountain. Two major trails converge in the unit, utilized 1-year contract in order to force harvest winter 2016, re-routed trail so recreation access could continue. Extensive outreach process utilizing social media and the focus group, signage to communicate with the public. No special consideration for visuals. DNR Timbersale Compliance Notes, harvest well documented.
10/18/16	Stangell	BB West U.2	16 acres -- Conifer release, hand cutting. Shelterwood completed 1996, shelterwood removal 2008, planted open areas 2009, slashing done July 2015. Removed alder, some Scotch broom. Heavy crop of trees, multiple ages and species. Scotch broom mostly controlled with chemical application through roadside spray.
10/18/16	Stangell	Stavis NRCA	5200 Acres, 'pristine' lowland forest adjacent to Hood Canal. Stavis Creek supports federally listed summer run chum. Expanding the boundary south along Hood Canal, US Navy matches funds.
10/18/16	Callaghan	Mainline Fish blockages	Fish culvert blockage noticed on Mainline Road. Three parties worked together to replace it with a bridge. Cost sharing in place as are revised easements for road use by the primary parties

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Date	Auditor	Site	Comments & Findings
10/18/16	Callaghan	Way Back	Road construction into the block look very good, a new "fish" pipe was installed and provides for better stream bed conditions. Examined two water crossings in RMZs the RMZS were all of the correct size and water crossings were well done. The harvest area had excellent tree retention, little or no site disturbance
10/18/16	Callaghan	MTTA	Met with the Mount Tahoma Trails Association, a volunteer group that maintains and develops recreational trails on DNR lands. A very strong relationship exists between DNR and The MTTA. Excellent communications and collaboration
10/18/16	Callaghan	Gun Range	Visited the site of designated gun range, discussed the land use and safety issues, inspected a closed gun range. DNR pays close attention to these
10/18/16	Callaghan	Park Bench	a small variable density thinning removing select trees, no impact was evident from the felling and skidding of large trees in fully socked forest
10/18/16	Callaghan	Bee Keeping lease	Inspected lease area, hives have been removed for year. Location is secure no evident hazards
10/18/16	Callaghan	Crestview	Variable Retention Harvest = good regeneration under a scattered canopy. Some areas have heavy alder competition which is being released by hand.
10/19/16	Stangell	Tiger Thinning U.1	Paul Footen -- Recreational opportunities within a working forest. 10 MM BF of harvest per year for the 42,000 acre Snoqualmie unit. 55 acre unit thinned in 2015, one type 3 stream, thinned stream buffer with the same prescription as the rest of the unit. Ground based system next to major highway (hwy 18) 120 foot right of way next to hwy 18 that is DOT RW. Unit greened up, looks good.
10/19/16	Stangell	King U.2	Drive-by, unit looks good. Checked sale jacket, unit completed summer 2016.
10/19/16	Stangell	King U.1	Verified sale notes. Arch pipe installed, road re-routed in order to have one stream crossing rather than 2. Road abandoned and reconstructed by Webber Logging. Seep/stream popped out in a section of the abandoned road, heavy flow does not deliver however sediment moving. Discussed possible erosion control measures. Completed per P&T October 6, 2016.
10/19/16	Stangell	Tiger Thinning U.7	157 acre unit, harvested May/ June 2015. Good documentation. Light thinning to 180 BA, light due to rain on snow zone, wind, potential for ice. Encouraged erosion control measures on road cut banks, heavy use by the public, mountain bike trails, runners, hikers.
10/19/16	Stangell	West Tiger Communication Tower	Walt Pulliam, state-wide manager for cell towers, 1/3 of state cell tower income from TV antennas on Tiger Mountain. Use SEPA process when identifying new sites, new sites required for emergency services.
10/19/16	Stangell	Master Link Trail	Met with Tor Bell, Mountains to Sound Greenway, Yvonne Kraus from Evergreen Mountain Bike Association, Rebecca Lavigne, Washington Trails Association, Sam Jarrett, DNR Recreation Manager Snoqualmie Unit; hiked Master Link mountain bike trail. DNR leverages volunteer labor to apply for grants for trail construction and maintenance. All input



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Date	Auditor	Site	Comments & Findings
			from groups was very positive, key word was collaboration. Sign system being developed to separate types of users, Master Link trail is one-way (uphill) for bicyclists, hikers may use the trail both directions but must yield to bicyclists. Signs being adjusted to be more clear, Sam working on standardization of the system.
10/19/16	Callaghan	Pumpkin 14	Recent harvest with ample retention, A hydraulic spill occurred previously and was reported and remediated by the logger - examined inspection reports. The forest includes a protected native trail head along a traditional travel route – Huckleberry Ridge trail. The harvest was planned with the input of the FN and specific protection measure were employed protecting specific trees or sites.
10/19/16	Callaghan	Team Wolf 2	Area was harvested in 2010 and planted in 2011, stocking is good. No issues
10/19/16	Callaghan	Pumpkin 11	Area of marbled murette habitat and includes an RMZ. The area is not prime habitat but has structure the bird might use. Part of the area is scheduled for harvest and has been well laid out and delineated

**2.4 - Interview and stakeholders input and treatment.**

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

Involved people		MA	AS1	AS2	AS3	AS4
category	name	Position				
Employee(s):	Doug Kennedy, Forest Certification Program Specialist					X
	Hannah Yourd, Forest Certification Program Specialist					X
	Allen Estep, HCP and Scientific Consultation Section Manager					X
	Tom Shay, Assistant Division Manager – Product Sales					X
	Ted Keeley, Rainier District Manager					X
	Brandon Mohler, Forest Manager –Elbe Unit					X
	Michelle Bell, Engineer					X
	Alan Mainwaring, South Puget Soound Region Biologist					X
	Doug McClelland, Region RCT Manager					X
	Laurie Benson, Region RCT Manager					X
	Nancy Barker, Recreation Manager, Elbe Unit					X
	Michelle Bell, Elbe Unit Engineer					X
	Art Tasker, South Puget Region Manager					X
	Scott Sargent, .Assistant Region Manager, South Puget Sound Region.					X
	Darin Cramer, Product Sales and Leasing Division Manager					X
	Angus Brodie, Forest Resources Division Manager					X
	Tyler Traweek, Forest Manager – Black Diamond Unit					X
	Paul Footen, Forest Manager – Snoqualmie Unit					X
	Sam Jarrett, Snoqualmie Unit Recreation Manager					X
	Katie Woolsey, South Puget Sound Region Natural Areas Manager					X
	Eric Bauer, Region Engineer					X
	Zach Beebe, ContractAdministrator					X
	Walt Pulliam, ComSite Manager					X
	Lee Roach, District Manager, Hood Canal					X
	Nathan McReynolds, Forest Manager – Belfair Unit					X
	Jesse Sims – Recreation Manager					
	Dave Guffler, Intensive Management Forester					X
	Bill Heymann, Engineer					X
	Michael Fowler, Contract Administrator					X
	Jacob Gross, Forester					X
Sub contractors:	Don Anderson	Anderson Logging				X

NB: Put a cross in each column or included new interviewed person.

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**2.4.2 - Stakeholders identification and consultation process**

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 Direct mail was issued to 61 identified stakeholders or Tribal communities 30 days in advance of this audit.

One group which had not previously been directly included in stakeholder consultations have been the various volunteer groups which work with the department on a variety of primarily recreation projects. Members for four groups who maintain and develop recreational trails were interviewed.

**2.4.3 - Record of stakeholder received comments or complaints**

Stakeholders reference (name / type)	date	Received comment or complaints	Theme (social, economy, environment)	Checked on site (YES or NO)	Answer from the certificate holder	Answer from Bureau Veritas
<b>To remove the name for public reports!!!</b>						
Institutions/individuals informed about the evaluation						
Individuals who were interviewed						
Mount Tahoma Trails Association Co-Founder	18/10/16	Has worked with WaDNR for many years they support the trails and are easy to work with	Social/Environment	Yes		Thanks for the input
Mount Tahoma Trails Association Board Member	18/10/16	As above	Social/Environment	Yes		Thanks for the input
Logging Contractor	19/10/16	Works with WaDNR regularly, WaDNR staff are on site regularly, worked well with tribean state over trail issue	Economic	Yes		Thanks for the input
Evergreen Mountain Bike Alliance	18/10/16	Have a positive relationship with the state and support the recreation efforts	Social/Environment	Yes		Thanks for the input
Mountains to Sound Greenway	18/10/16	A positive relationship with the state. Good cooperation between the parties	Social/Environment	Yes		Thanks for the input
Washington Trails Association	18/10/16	Enjoy coordinating trail development and use with	Social/Environment	Yes		Thanks for the input

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		WaDNR				
	Individuals who contributed information in writing					

**2.5 - Other evaluation techniques**

None

**3 - Update about any changes to the scope of the certificate**

There have been no changes in :

- Legal & Administrative Context
- Land Use
- Ownership & Use Rights
- Forest Composition
- HCVFs & RTE species
- Commercial Products
- Forest Management or
- Timber Traceability

**3.1 - Use of chemicals**

Washington DNR uses a variety of herbicides for both controlling competing vegetation and preparing sites for planting. In 2016 the state treated 394 ha for competition control and 390 ha of site preparation.

Chemical pesticide name	Active ingredient of the chemical product	Reason for use	Quantity (liters)
Accord XRT	Glyphosate	Site preparation/ Tending	333.2
Chopper	Imazapyr	Site preparation/ Tending	496.9
Clopyralid3	Clopyralid	Site preparation/ Tending	42.9
MILESTONE VM	Triclopyr	Site preparation/ Tending	84.2
Opensight	Metsulfuron methyl	Site preparation/ Tending	1
Rodeo	Glyphosate	Site preparation/ Tending	811.0
Oust EXTRA	Sulfonometuron methyl	Site preparation/ Tending	7.0
Sulfo EXTRA	Metsulfuron methyl	Site preparation/ Tending	78.6

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**3.2 - Number of accidents in forest work (serious/fatal) since the last audit**

There have been no serious accidents or fatalities involving either state employees or its contractors.

**4 - Standard**

	Ref / n° management FSC national standard	Ref / n° checklist	Other documents if relevant
<b>Main assessment</b>	FSC US national forest management standard	SF03 FSCUS FM v1	FSC-STD-40-004
<b>Surveillance 1</b>	FSC US national forest management standard	SF03 FSCUS FM v1	FSC- STD 40-004 FSC- STD -20-007
<b>Surveillance 2</b>	FSC US national forest management standard	SF03 FSCUS FM v1	FSC- STD 40-004 FSC- STD -20-007
<b>Surveillance 3</b>	FSC US national forest management standard	SF03 FSCUS FM v1	FSC- STD 40-004 FSC- STD -20-007
<b>Surveillance 4</b>	FSC US national forest management standard	SF03 FSCUS FM v1	FSC- STD 40-004 FSC- STD -20-007

**5 - Observation**

**5.1 - Documents review**

Administrative and legality

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

Internal social issues

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- *DNR conducted an agency-wide survey to assess the safety within the agency and incorporate results into the Safety Improvement Process that is part of the DNR Strategic Plan.*
- DNR's Safety Survey 2011 Results (email & presentation)
- DNR's Strategic Plan: 2010–2014 (Goal VI.E)
- Training Book for the Forester 1 – State Lands
- State Lands Quality Initiatives Memo on improving training

External social issues

- Tribal Relations Website(s) (WADNR and SharePoint)
- Commissioner's Tribal Relations Order #201029, 2010
- Skokomish Tribe Litigation Summary: Lily B. Smith, Legal Affairs Manager 10.09.14
- Logger Safety Initiative
- Safety Standards for Logging Operations
- SIC Recommendations for Qualified Loggers
- Forest Land Planning Spatial Layer Info w/public comments
- DNR Social Impact Assessment Summary
- Final Environmental Impact Statement on Alternatives for Sustainable Forest Management of State Trust Lands in Western Washington and for Determining the Sustainable Harvest Level
- Process: Notifying adjacent landowners re Timber Sale
- Snoqualmie Corridor Recreation Plan — March 2015

Environmental and HCVF

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

Management and harvesting operation

- Planning & Tracking Database
- Timber Sale Contract Clause and Administration Manual
- Timber Sale Logging Plan of Operations form
- Black Diamond Field Package
- Elbe Field Packages
- Snoqualmie Field Package
- Belfair Field Package

Monitoring process

- Average annual cut / annual growth for south Puget (growth / yield)

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- Planning & Tracking Database
- Sustainable Harvest Calculation Packet – Westside
- Sold Sales in South Puget HCP Planning Unit
- Natural Heritage Monitoring / Volunteer / Partnership
- DNR Annual Report 2015

**5.2 - Evaluation results with reference to the FSC referential / standard which have to be evaluated in surveillance audit**

The Washington Department of Natural Resources forest and land management system, as it has been implemented, 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 competent staff who live and work in the communities within the forest management unit. 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.

During this surveillance audit the following required criteria were assessed: 1.5; 2.3; 3.2; 4.2; 4.4; 5.6; 6.2; 6.3; 8.2; and 9.4. Additionally, all of Principles 1, 3, 4 and 6 were assessed.

**PRINCIPLE 1: Compliance with law 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 Habitat Conservation Plan and the State Forest Practices Act. WDNR restricts and controls access to State lands when necessary using road abandonment, gates and signs. Illegal logging has not been a significant problem on the South Puget Planning Unit. No regulatory actions have been taken against WDNR in South Puget as of October 1, 2016.

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

WDNR manages timber harvests from forested state trust lands in a manner consistent with accepted best practices for sustainability. WDNR is working with FSC US to generate more direct benefit to trust beneficiaries from FSC certification which could justify expansion of the program to more forested state trust lands.”

No non-conformances were identified against this principle

**PRINCIPLE 2: Tenure and use rights and responsibilities**

There have been no disputes over tenure and use rights on the forest. There have been disputes in the past with individual tribes which have been litigated and resolved.

No non-conformances were identified against this principle

**PRINCIPLE 3: Indigenous Peoples’ Rights**

Washington DNR maintains government-to-government relations with the 13 federally-recognized Indian Tribes residing in the South Puget Sound HCP planning area. The department recognizes the Tribes’ separate rights and authorities and commits to work to resolve problems, and to develop relations at all levels of the department to assure good communication and availability of technical and policy expertise. The Commissioner’s order on tribal relations -- *“It is further ordered that DNR staff members are encouraged to resolve mutual issues and concerns with the Tribes whenever possible at the organizational level that is closest to the issue and that has appropriate delegated authority”* has been seen to be well implemented.



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During the audit the Huckleberry Ridge trail was visited and found to be well protected. The trail is a traditional route used by local tribes. The WDNR worked with the tribes and logging contractor to ensure that a proper level of protection and respect was afforded this trail.



**Figure 1. Huckleberry Ridge Trail protected during harvest operations**

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

No non-conformances were identified against this principle

**PRINCIPLE 4: Community relations and worker's rights**

To foster good community relations and to garner local involvement, planning areas may have focus groups,

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made up of local stakeholders and any member of the public that wishes to attend. These committees, along with local WDNR staff, reach out to stakeholders and solicit their help in explaining and maintaining the forest ecosystem. WDNR also participates in public education by working with local schools and interest groups about natural resource management. Finally, WDNR has an active volunteer program which helps to monitor and manage the forest. WDNR has an extensive public consultation program that seeks public input on policies, plans and forest operations. As per the State Environmental Policy Act, public input is sought on all activities and policies which may affect the environment.

There are a number of volunteer organisation operating on the forest who work with WDNR to develop promote and manage recreational resources. Auditors met with members of the Mount Tahoma Trails Association, Evergreen Mountain Bike Alliance, Washington Trails Association, and Mountains to Sound Greenway. All groups were very complimentary of WDNR and the great support and assistance they get from the department.

WDNR is a public agency and a responsible employer. Its policies meet or exceed the legislative requirements in labor relations, public health and safety, and public procurement. The WDNR follows State Labor and Industry Laws to focus on worker (and contractor) safety. WDNR provides wages and benefits that are well above average for the State. Contractors are treated fairly with the conditions of employment expressed in a valid contract. Interviews with loggers confirmed that workers earn a "Good Living". Through its policies and legislation the State meets the intent of the ILO labour accords.

No non-conformances were identified against this principle

**PRINCIPLE 5: Benefits from the Forest**

The harvest on the forest in 2016 was 113,245 m3 (22,075 MMBF) which is approximately 70% of the current annual allowable cut (AAC). AAC's are developed for sustainable forest units (subset of the FMU) every 10 years and incorporate a range of data and assumptions with regards to land availability, Growth & yield, pathogens, reserved and management objectives. Timber volumes harvested do not exceed annual growth.

Currently the State is preparing a new set of analysis in support of the AAC. This effort is being developed using a new forest inventory and planimetric data.

No non-conformances were identified against this principle

**PRINCIPLE 6: Environmental Impact**

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

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

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

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 (figure 2). 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



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had obvious leave trees (20+ per hectare), as well as, peninsular leave areas and riparian areas where all vegetation remained.



**Figure 2. Recent harvest on the Pumpkin Harvest with dispersed and clumped retention.**

On a majority of harvest sites, the predominate native tree species is Douglas-fir which require openings for regeneration and vigorous young-stand development. The harvest systems used were found to be appropriate and effective for conifer regeneration. Plantings enhance diversity by controlling species composition and age distribution. WDNR Forest Practices Act has a “green up” size and designation for regeneration size and adjacent areas.

All roads are generally surfaced and are subject to restricted use during extremely wet weather where damage can occur to the road sub-grade. Roads are designed and located in conjunction with sale preparation activities. Road spacing and design is based on logging systems to be used and the overall transportation plan for the area. The Road Engineer is involved in the layout and /or review of the harvest and road plan. Landings are located on ridge points and along roads away from water courses and seeps. Landings are normally sloped so that water can drain. Surfaced roads are water-barred and generally barricaded. Most roads are gated and access is restricted for all or part of the year. Designated roads are open to the public for recreation and hunting.

The Washington Forest Practices Act regulations with regards to water quality and water bodies exceed those of the FSC US Forest Management standard. The WDNR exceeds the Forest Practices Act requirements in all situations and has an excellent program of water quality protection. Stream crossings are designed for the 100 year flood event. The South Puget Unit has a list of all crossings that are fish barriers and has undertaken their removal or replacement. The auditors observed five locations where fish barrier culverts had been replaced (Figure 3).

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**Figure 3. Mainline Fish Blockage repaired with a new better crossing**

WDNR undertakes some ground and hand herbicide applications on a small percentage of the ownership. Herbicides are used to either prepare sites for regeneration or to release trees from vegetative competition. WDNR has an approved list of herbicide use, which includes herbicides with shortest half-life and those that can be used at the lowest concentrations. From a review of the five year summary of herbicide use Triclopyr (ester formulation) was the major product used. None of the chemicals used by WDNR was from the FSC list of highly hazardous chemicals. An integrated pest management approach was evident, with chemical pesticides used only after no treatment and non-chemical treatment options are considered.

WDNR closed a minor nonconformance related to the lack of a statement in the pest management strategy which specifies a desire to “*reducing or eliminating chemical use whenever feasible*”. The strategy was updated. (NC 2015 – 1)

No non-conformances were identified against this principle

**PRINCIPLE 8: Monitoring and Assessment**

Washington DNR has a robust system for monitoring activities, resources and forest conditions. A new forest



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

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

Roads are monitored through the RMAP process. All maintenance work was to be completed by 2016 which will be achieved. Foresters monitor certain road segments, those that are prone or have high risk of failure during large weather events.

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

No non-conformances were identified against this principle

**PRINCIPLE 9: Maintenance of high conservation value forests**

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

No non-conformances were identified against this principle

**PRINCIPLE 10: Plantations**

Not Applicable

WDNR forests are managed to emulate and enhance the principle characteristics and key elements of native forest ecosystems, and therefore they do not meet the FSC US Forest Management Standard's definition of a plantation.

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

**5.3 - Result regarding the correction of Non-Conformities (NC)**

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n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non- conformities	Closure date
6	6.6 b	MINOR	11/5/2015	The WDNR IVM strategy addresses the requirements to demonstrate consideration of non-chemical alternatives and that, when chemicals are used, the least environmentally damaging formulation and application method is used. However, the written strategy does not include language that addresses the requirement to establish a goal of reducing or eliminating chemical use whenever feasible.	Was classed as minor as it is a policy commitment which does not directly affect sustainability or the use of forest chemicals	11/4/2016	CLOSED	Reviewed revised strategy and training materials used with staff	10/17/2016

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**5.4 - Result regarding the resolution of complaints**

There have been no complaints made with regards to this certification to either the Washington DNR or to Bureau Veritas Certification

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

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## 6 - Result of surveillance evaluations

MAIN ASSEMENT DATE	
Number of NC closed	No NCR's were closed
Pending NC	No NCRs are pending
New NC raised	Two minor NCRs were issued. NCR 01 Indicator 8.1a, and NCR 02, Indicator 6.7a)
Certification Decision	A recommendation for continued certification was issued
SURVEILLANCE 1 DATE 21-23 OCTOBER 2013	
Number of NC closed	Two minor NCRs were closed. NCR 01 Indicator 8.1a, and NCR 02, Indicator 6.7a)
Pending NC	No NCRs are pending
New NC raised	Minor NCR 03 Indicator 4.2 was issued.
Certification Decision	A recommendation for continued certification was issued
SURVEILLANCE 2 DATE 20-23 OCTOBER 2014	
Number of NC closed	One major NCR was closed on Jan 20, 2015. (NCR -05 Indicator 6.1.2) Minor NCR 03 Indicator 4.2 was closed
Pending NC	No NCRs are pending
New NC raised	One minor NCR was issued NCR 04 Indicator 8.2b)
Certification Decision	A recommendation for continued certification was issued
SURVEILLANCE 3 DATE 2-5 NOVEMBER 2015	
Number of NC closed	One minor NCR was closed (NCR 04 Indicator 8.2b)
Pending NC	No NCRs are pending
New NC raised	One minor NCR was issued (NCR 06, Indicator 6.6.b)
Certification Decision	A recommendation for continued certification was issued.
SURVEILLANCE 4 OCTOBER 17 TO 20 2016	
Number of NC closed	One. Closed NC 6 relating to chemical use policy
Pending NC	None
New NC raised	None
Certification Decision	Continue certification

### 6.1 - Synthesis on the conduct of the audit and closing meeting

A closing meeting was held on October 20 in the DNR offices in Olympia. Matters of nondisclosure and confidentiality were discussed. The positive nature of the audit was discussed as was the lack of nonconformances. The auditors recommended continued certification.

## 7 - Records of Non-Conformities and observations and new ones raised during the audit

### 7.1 - Records of Non-Conformities

*No New Non-Conformities were raised during the audit.*

n°	Indicator	Status	Date recorded	Text of the NC	Objective Opening evidence and justification of their classification of major or minor	Closure deadline required	POTENTIAL NEW STATUTE	Closure evidence or remaining non-conformities	Closure date

### 7.2 - Records of observations

*No new observations raised during the audit, or pending*

n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence

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## 8 - Proposals regarding the certification decision

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

The certificate holder is in continued conformity with the certification requirements. The certificate should be maintained.

## 9 - Certification decision

The HUB decides that the FSC FM certificate of Washington Department of Natural Resources remains valid.

Issued November 23 2016 (revised March 1 2017),m reviewed the end of revision date

FM certification technical manager,

Lead Auditor,

Eglantine Gouz-Cottin



Brian Callaghan



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## 10 - Appendices

- A. CV of the members of the audit team
- B. Checklist(s)
- C. Documents remitted by the applicant and any additional information that permits to justify the reports or recommendations of the auditor
- D. Copy of the non-conformity form(s)