

FSC™ CERTIFICATION SYSTEM

FOREST MANAGEMENT CERTIFICATION SURVEILLANCE AUDIT n°3 Public REPORT

Report finalisation date: 20 December 2020

Washington State Department of Natural Resources:
South Puget HCP Planning Unit
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Forest location(s): USA, Washington State

Certificate registration code: BV-FM/COC-080501

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Date of expiry: 13 May 2023

Main Evaluation :	31 October – 3 November 2017
Surveillance 1	8-11 October 2018
Surveillance 2	15-17 October 2019
Surveillance 3	22-24 September 2020
Surveillance 4	

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**FSC Forest Management Certification
Surveillance Audit Report
Washington State Department of Natural
Resources**

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1 - Description and background of the applicant forest entity

Forest Management company			
Name	Washington State Department of Natural Resources		
Address	1111 Washington St. SE, MS 47014 Olympia, WA 98504-7016		
Telephone	360-902-1283		
E-mail	Nicole.Jacobsen@dnr.wa.gov		
Web site	www.dnr.wa.gov		
State of Washington – Commissioner of Public Lands	Hilary Franz		
Contact person (responsible) for FSC certification	Nicole Jacobsen		
FSC trademark responsible	Nicole Jacobsen		
Activity	Forest Management		
Category of forest management	Natural forest		
Number of forest workers (including contractors):	Forest field activity	109 (male)	31 (female)
	Administrative/office activity	9 (male)	3 (female)
	Industrial and transformation process (if relevant)	NA (male)	NA (female)

The Washington State Department of Natural Resources (Washington DNR) 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 (PSF), and DNR's Habitat Conservation Plan (HCP), which is a contractual agreement with the U.S. Federal Services (United States Fish & Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) 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. DNR 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 most comprehensive sets of forest practice regulations in the United States.

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2 - Scope of certificate

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

2.1.1 - Certificate

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

2.1.2 - Description of FMUs

Classification	Number of FMUs	Total forest area (ha ¹)			
		Privately managed	State managed	Community managed	Total
Less than 100 ha in area					
100 – 1000 ha in area					
1000 – 10 000 ha in area					
More than 10 000 ha	1		71 289		71 289
Meeting the eligibility criteria as SLIMF					
TOTAL	1		71 289		71 289

¹ 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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2.2 - Product categories and main commercial timber:

List of Timber Product Categories available for sale as FSC-certified products				
Trade Name	Species (botanical name)	Product Type/ Nature (round wood, pulpwood)	Selling mode	FSC product claim
hardwood and softwood logs	<i>Thuja plicata</i> <i>Callitropsis nootkatensis</i> <i>Tsuga mertensiana</i> <i>Tsuga heterophylla</i> <i>Pseudotsuga menziesii</i> <i>Abies grandis</i> <i>Abies procera</i> <i>Abies amabilis</i> <i>Pinus contorta</i> <i>Pinus monticola</i> <i>Picea engelmannii</i> <i>Picea sitchensis</i> <i>Taxus brevifolia</i> <i>Alnus rubra</i> <i>Fraxinus latifolia</i> <i>Betula papyrifera</i> <i>Prunus emarginata</i> <i>Populus trichocarpa</i> <i>Crataegus douglasii</i> <i>Arbutus menziesii</i> <i>Acer glabrum</i> <i>Acer macrophyllum</i> <i>Quercus garryana</i> <i>Salix species</i>	W1.1 Roundwood	Lump sum or per unit scale mill delivered	FSC 100%

DNR sells roundwood logs either on the stump or harvested under contract, with the vast majority being stumpage sales. The primary species include: Douglas Fir (*Pseudotsuga menziesii*), Western Red Cedar (*Thuja plicata*), Western Hemlock (*Tsuga heterophylla*), Pacific Silver Fir (*Abies amabilis*), Noble Fir (*Abies procera*) and Red Alder (*Alnus rubra*). DNR also sells the harvest rights for conifer boughs and brush from a variety of tree and shrub species but does not market these products with FSC claims.

2.3 - In case of Group certification

Not Applicable – Single FMU.

3 - Description of evaluation

3.1 - Composition of the audit team

Evaluation Team (main assessment)	Notes and CV (put CV in appendices and sum up the notes from previous audits) of team member	MA	AS1	AS2	AS3	AS4
Team Leader	Brian Callaghan	X				
Auditor	Sarah Bros	X	X (Lead)	X (Lead)		
Auditor	Craig Howard	X				
Auditor	Jim Colla		X		X (Lead)	

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3.2 - Description of the audit program.

3.2.1 - Surveillance audit schedule and last survey audit schedule

Due to COVID-19, and to comply with local government and DNR policy, certain portions of the audit* were conducted remotely using information and communication technology remotely in accordance with IAF MD4:2018 guidelines. Field portions of the audit followed social distancing guidelines.

Prior off-site audit activities: Stakeholder identification, audit planning and preparation

Date: September 22, 2020 (remote)*

Time	Activity	BVC Rep.	Company Rep.
8:00 AM	Opening Meeting - audit scope & approach, non-disclosure, appeals	Colla	Jacobsen
8:30 AM	Document review selected indicators	Colla	Jacobsen
4:00 PM	Final field site selections & daily debrief	Colla	Jacobsen

Date: September 23, 2020

Time	Activity	BVC Rep.	Company Rep.
8:00 AM	Field session: site visits & interviews	Colla	Traweek
4:30 PM	Daily debrief	Colla	Jacobsen

Date: September 24, 2020 (remote)*

Time	Activity	BVC Rep.	Company Rep.
8:00 AM	Remote field audits	Colla	Jacobsen
12:00 PM	Follow up document review and stakeholder consultation and interviews		
3:00 PM	Prepare audit findings	Colla	
3:30 PM	Closing meeting - audit findings, NCs, next steps, confidentiality and appeals	Colla	Jacobsen
4:00 PM	End audit		

Post off-site audit activities:

Report writing

Statement of the total person days spent for assessment:

activity	Number of man-days
Audit activity on field	3.0
Stakeholder consultation	0.5
TOTAL	3.5

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

The DNR South Puget HCP Planning Unit is a single FMU with multiple management units. During the audit, sites covering a range of activities were selected for visit by the auditor. Sites were visited, and activities observed included active harvest, wetland and riparian reserve management zones, public recreation activities, wildlife management and protection, road infrastructure and maintenance. Three DNR staff, two stakeholders, and three forest workers were interviewed during the field site

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inspections. The audit was conducted in accordance with COVID 19 and DNR guidelines in place at the time of the audit; which resulted in some sites being audited using remote audit techniques.

Date	Site	Comments
23-Sep	Howard Hansen Dam	Land ownership within Green River watershed requires extensive cooperation between landowners. An Interagency Agreement between DNR and City of Tacoma for road uses including co-op on maintenance expense. No public entry of use as it is a municipal watershed (HCVF). Chemical use is extremely restricted, all use is heavily monitored by City of Tacoma
23-Sep	Double Span, 30-091786	An active variable retention harvest unit by combination of traditional line logging and shovel. The unit has a landslide risk assessment, rain on snow prescription, riparian management zones, wetland management zones. The logging crew had all required PPE, spill kits, first aids kits, emergency response and communication plan. Contractor is well verse in all requirements and keeping up on BMP work, protecting groups and dispersed retention from skidding damage, and monitoring haul conditions with the wet weather.
23-Sep	Harrys Hangout TS – units 1-3, 30-097371	Completed improvements and upgrades to construct/reconstruct by install/replace relief culverts, spot rock and grade. Well completed and stable, no evidence of sloughing or erosion issues. Stream are running clean
24-Sep	Piling TS – unit ,1 30-097369	400' of rebuilt road completed to a jump up rock pit; Site is stable, ROW logs have been removed, road and pit are shaped to facilitate drainage.
24-Sep	Benny Beaver, Unit 4	VDT & VRT harvest completed 2017 (95 ac); habitat enhancement & riparian enhancement; viewed murrelet habitat tool; discussion on identification of murrelet habitat. The unit was virtual inspected by drone and interview via video. Site appears stable with tree retention goals met.
24-Sep	Tahoma Ski Huts	System of winter ski trails 50 miles with four huts, highly scenic; partnership with a local association to provides huts, maintain them, and manage the recreational uses of this world class facility.
24-Sep	Double Span, Active Harvest FMA: 249659	Virtual tour via drone of the same site physically inspected the day prior. Drone footage shot a few weeks earlier under dry and sunny conditions, in contrast to 9-23 inspection which was under wet and soggy conditions. For unit inspections drone are fine to see unit layout and buffered areas; but detail in terms of road and drainage conditions and residual tree protection cannot effectively be assessed.
24-Sep	Elbe Hills ORV	Tent and RV parking and camping area built in '77 (60 year lease) adjacent to riparian area and owl habitat. The site is being relocated with input from stakeholders to a more central ORV use are in a location in a 2019 commercial thin unit and out of wetlands or NSO habitat. Virtual tour via drone, which is very effective for a site visit of this type of activity.

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3.3 - Interview and stakeholders input and treatment.

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

Involved people (contracted by the company)			MA	AS1	AS2	AS3	AS4
Category	name	Position					
Manager	Douglas Kennedy	Forest Certification Program Lead	X	X	X		
	Nicole Jacobsen	Forest Certification Program Lead				X	
Employee(s):	Names withheld	DNR staff	37	31	12	6	
Sub-contractors:	Name withheld	Logging contractor		1		1	
	Name withheld	Road contractor		1			
Stakeholders	Name withheld	Forest workers		2	3	2	
	Name withheld	Tacoma Watershed staff		2		2	

3.3.2 - Stakeholders identification and consultation process

For the 2017 renewal audit, stakeholders were first identified during a pre-audit consultation discussion and formally consulted starting on September 14, 2017; prior to the renewal audit commencing on October 31, 2017. Stakeholders were sought for consultation on-site for on this 2020 surveillance audit as described below:

3.3.3 - Record of stakeholder received comments or complaints

Stakeholders reference (name / type)	date	Received comment or complaints	Theme (social, economy, environment)	Checked on site (YES or NO)	Answer from the certificate holder	Answer from Bureau Veritas
Institutions/individuals informed about the evaluation						
		See below				
Individuals who were interviewed						
Forest Contractor (1) and Workers (2)	23 Sept 2020	Safe work environment, all workers are well trained, DNR is great is to work with	social, economic	Yes	Maintaining a well-trained logging workforce is critical to managing our forests	Confirmed in the field by direct observation. Thank you for interest and comments
Local Government	23 Sept 2020	DNR is a great partner in managing the watershed. They do excellent work.	environment	Yes	Long standing cooperative working arrangement	Confirmed in the field by direct observation. Thank you for interest and comments
Individuals who contributed information in writing						
		none				

3.4 - Other evaluation techniques

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None used

4 - Update about any changes to the scope of the certificate

4.1 - If changes about legal and administrative context

None noted, except for the change in certification manager to Nicole Jacobsen

4.2 - If changes about the other land use or activity in the forest included in the audit scope

None noted

4.3 - If changes about the ownership and use rights

None noted

4.4 - If changes about forest composition (e.g. Added or excised FMUs)

None noted

4.5 - If changes about HCVF and endemic, rare, threatened or endangered species

No changes, 35,748 HA of HCVF

4.6 - Use of chemicals

Commercial name of the pesticide	Active ingredient of the chemical product	Reason for use	Approximate quantity used / year	Size of area treated annually
RODEO	Glyphosate	Site preparation to control woody vegetation and grasses	376.76 liters	162..34
ROTARY_2_SL	Amazapyr	Site preparation to control grasses/broadleaf weeds	376.76 liters	
OUST EXTRA	Sulfometuron methyl	Site preparation to control grasses, weeds and vines	19.69 liters	

The table lists those chemicals that were applied from 1 July 2019 through 30 June 2020 (fiscal year). DNR uses chemicals to control competing vegetation in regenerated sites and as a site preparation tool prior to tree planting. DNR has completed a specific evaluation of pesticides used on the forest in relation to FSC-POL-30-001 v3.0. FSC US has developed an ESRA template for the noted pesticide; DNR has adopted the templates to meet their needs effective 1 September 2020.

4.7 - If changes about commercial timber and non-commercial timber

No changes

4.8 - If changes about forest management

No changes

4.9 - If changes about traceability

No changes

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4.10 - Number of accidents in forest work (serious/fatal) since the last audit - none

5 - Standard

	Ref / n° management FSC national standard	Other relevant standards and documents
Main assessment	FSC US Forest Management Standard V1.0	FSC-STD-20-007, v3.0 FSC-STD-50-001, v2.0
Surveillance 1	FSC US Forest Management Standard V1.0	FSC-STD-20-007, v3.0 FSC-STD-50-001, v2.0
Surveillance 2	FSC US Forest Management Standard V1.0	FSC-STD-20-007, v3.0 FSC-STD-50-001, v2.0
Surveillance 3	FSC US Forest Management Standard V1.0 https://us.fsc.org/en-us/certification/forest-management-certification	FSC-STD-20-007, v3.0 FSC-STD-50-001, v2.0
Surveillance 4		

6 - Observation

6.1 - Documents review

Administrative and legality

- South Puget HCP Planning Unit Forest Land Plan Final EIS
- Timber Sales Contract Clause and Administration Manual.
- Washington DNR's Annual Report 2019
- Washington State Forest Practices Rules (WAC 222)

Internal social issues

- DNR Safety and Health Policy 2017
- DNR Emergency Response Plan and Logging Plan of Operation
- Big Ben Report 18959

External social issues

- Tribal Relations Website(s) (WDNR external and internal SharePoint)
- Safety Standards for Logging Operations (WAC 296-54)
- WCLA Master Logger Training Program

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- SEPA (stakeholder) Distribution List 2020

Environmental and HCVF

- DNR SEPA Handbook SharePoint Site
- PO14-008 Old Growth Policy
- PO14-009 Wildlife Habitat Policy
- PO14-010 Watershed Systems Policy
- PO14-011 Riparian Conservation Policy
- PO14-012 Special Ecological Features Policy
- HCP (Habitat Conservation Plan) 2019 Annual Report
- Marbled Murrelet Long Term Conservation Strategy
- FSC ESRA 2020

Management and harvesting operation

- Timber Sale Contract Clause and Administration Manual (October 2019)
- Timber Sale Logging Plan of Operations form
- Double Span and Harry's Hangout Field Package (contract, maps, inspections)

Monitoring process

- Remotely Sensed Forest Inventory Resource System
- FY20 Activity Planning & Tracking Databases
- FY20 Sustainable Harvest Calculations
- FY20 Chemical Use records

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

PRINCIPLE 1: Compliance with law and FSC Principles

The State of Washington has a mature suite of environmental laws and regulations. Forest management is also directed internally by the Policy for Sustainable Forests (PSF), and DNR's Habitat Conservation Plan (HCP), which is a contractual agreement with the U.S. Federal Services (United States Fish & Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) which include DNR-managed forested state trust lands within the western part of the State as well as some lands on the east slopes of the Cascade Range. Washington DNR continues to conform to applicable laws and regulations. The Department carries out a variety of compliance monitoring activities, related to both the Habitat Conservation Plan and Washington State Forest Practices Act. DNR restricts and controls access to State lands when necessary, using road abandonment, gates and signs. No illegal activity evidence noted at any of the tracts inspected. No citations or notice to comply have been issued by any regulatory agencies. DNR foresters inspect harvest operations while active at least weekly. Inspection reports on reviewed field audited site are well detailed and accurately reflect conditions.

PRINCIPLE 2: Tenure and use rights and responsibilities

Any activities on the ownership must be in compliance with a myriad of state and federal laws and established use rights. There has been no change regarding tenure use and responsibilities. DNR has clear title to the state trust lands. There have been no recent disputes over tenure and use rights on the forest. Each timber sale is open for review and comment through the Forest Practices Application Review System (FPARS) which provides the public's ability to review proposed forest activities. Interaction with stakeholders is well documented.

PRINCIPLE 3: Indigenous Peoples' Rights

DNR maintains government-to-government relations with the 13 federally-recognized 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. DNR has a tribal relations program that includes annual summit meetings inviting all federal and non-federal recognized tribes within the State of Washington. The state archeologists work with local tribes prior to setting up a timber sale if it is suspected a cultural resource may be present.

PRINCIPLE 4: Community relations and worker's rights

WDNR is a public agency and a responsible employer. Its policies meet or exceed the legislative requirements in labor relations, public health and safety, and public procurement. DNR follows State Labor and Industry Laws to focus on worker (and contractor) safety. DNR provides wages and benefits that are well above average for the

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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 labor accords. All DNR employees are covered by a public service collective bargaining agreement, which ensures a fair rate of compensation. All service contracts include requirements to ensure State and federal health and safety requirements are met. State and DNR COVID-19 guidelines were followed throughout the course of the audit. There are a number of agency partners and volunteer organizations operating on the forest who work with DNR to develop promote and manage recreational resources; Tahoma Ski Huts and Elbe Hills ORV examples were virtually toured.

PRINCIPLE 5: Benefits from the Forest

The South Puget HCP Planning Unit remains a significant contributor to the economy with average annual timber sales in FY20 of approximately \$19 million. Harvest does not exceed growth. DNR does not permit export of logs, which reinforces the local economy and favors local producers. The funds generated by resource management are distributed to the various public trusts, which fund statewide construction of public schools, universities, prisons and other state institutions. Most timber is sold as stumpage with the buyer merchandising standing timber. Some small direct sales are available to smaller contracts, which are specifically undertaken to encourage small business. As the steward of state trust lands, WDNR actively plans recreation opportunities. Through extensive involvement from local recreation groups, WDNR volunteers, and the public. On-site evaluations determined that adequate resources and trained professional foresters are available to implement core management activities. This was evident through excellent management of harvest operations, knowledgeable forestry staff and competent harvesting contractors. NTFP removals (Salal, cedar boughs, mushrooms, etc.) are incidental and limited; sold by permit, these are not tracked as FSC products.

PRINCIPLE 6: Environmental Impact

The South Puget HCP Planning Unit has a Final EIS which has been reviewed extensively by the public prior to approval. Annual reports on the implementation of the HCP (FY19 reviewed) address progress towards conservation objectives (e.g. riparian habitat, Spotted Owl, Marbled Murrelet), adaptive management, silvicultural activities, roads management, land transactions, non-timber management activity, and recreational programs. The HCP, EIS and annual reports are available online. Environmental impacts of forest management have been addressed at the forest level through the HCP and EIS. These documents assess potential impacts at a strategic level. At the planning stage for each site, detailed plans are created to identify features that might be impacted by forest operations (i.e. access, cultural resources, harvest, silviculture), and prescriptions are applied to mitigate the impacts. For example, riparian areas and recreational trails are pre-identified and set prescriptions are applied. Pre-harvest boundary marking, and cruising identify most other stand level features (e.g. nests, wet areas) that might have been missed in site documents. Harvest prescriptions include direction for leave tree retention, soil impact management, and riparian management zones. Habitat features for rare, threatened or endangered species are applied at both the strategic level and in the detailed harvest preparation. Innovative methods to create foraging and dispersal habitat for northern spotted owls are being applied.

The State Environmental Policy Act (SEPA) is applied on all timber sales. DNR 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 DNR 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.

On harvest sites viewed on the audit, the predominate native tree species is Douglas Fir (*Pseudotsuga menziesii*) which requires large openings for regeneration and vigorous young-stand development. The harvest systems used were found to be appropriate and effective for conifer regeneration. Planting enhances the diversity by controlling species composition and age distribution. Regeneration harvest blocks in even-aged stands average 40 acres or less. However, some individual harvest blocks can exceed 60 acres. The Department's PSF, developed by a qualified team of experts, allows harvest blocks up to 100 acres to reduce edge-effect, reduce roads on the landscape and to reduce the number of entries into a stand/block. Clumped and/or dispersed leave trees are required to be left in all harvest units. Also, all blocks viewed during the audit include wetland protection and/or riparian leave tree areas.

Observations confirmed roads, landings and skid trails are well-drained and in a stable configuration. Many 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.

DNR undertakes some ground based herbicide applications on a small percentage of the ownership. Herbicides are used to either prepare sites for regeneration through vegetation control or to release trees from vegetative competition. On the one active logging job inspected; there was no evidence of petroleum spills or leaks and no on-site storage.

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PRINCIPLE 7: Management Plan

Not audited this surveillance, no changes.

PRINCIPLE 8: Monitoring and Assessment

Washington DNR has a robust system for monitoring activities, resources and forest conditions. Forest operations are monitored through the Land and Resource Manager (LRM) system which is a repository for all management information for a stand or site. Timber sale and road inspections are carried out by DNR staff. The LRM database contains all the information for each stand and activity therein. Roads are monitored through the RMAP process. Audit observations confirm RMAP projects have been being completed as planned.

The DNR also monitors rare, threatened and endangered (RTE) species through the Habitat Conservation Plan (HCP) which protects several RTE species. DNR reports annually on progress toward meeting HCP objectives. The implementation monitoring program covers many of the HCP objectives including no harvest areas and buffers.

Stand level forest inventory work is ongoing for use in the upcoming allowable cut calculation and subsequent revisions to the forest management plan. DNRs cutting edge efforts coming out of (RS-FRIS) Remotely Sensed Forest Resource Inventory System using LIDAR and DAP will not only further refine their inventory system but will be able to clearly identify critical habitats with a much higher degree of accuracy than can traditional assessment methods. This is notable.

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 cooperate 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. 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. A review of the documents and interviews with DNR confirm any prescribed or proposed activities are designed to maintain or enhance HCVF attributes. There have been no changes in HCVF since the last audit.

PRINCIPLE 10: Plantations

Not applicable

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6.3 - Result regarding the correction of Non-Conformities (NC)

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
01	1.6a	MINOR	4 Sept 18	The State of Washington is unable to sign the current Policy of Association Declaration (FSC-POL-01-004) due to conflicts with their legislative mandate and the constitutional rule of law.	The Washington Department of Natural Resources is a state agency which is required to abide by all State laws and regulations. These laws and regulations cover all aspects of the FSC Policy of Association (FSC-POL-01-004). The State cannot sign off or endorse the Policy of Association as it relates to an international treaty that has yet to be ratified by the federal government.	3 Sept 19	Closed	Washington DNR will continue to analyze the potential legal consequences that signing the PfA/Annex C might have for our operations, our certificate, and our stakeholders. Between now and the Washington DNR's 2018 FSC audit, the agency will seek further information. 1. What is the expected release date of the Policy for Association, Version 3? 2. Engage the State Attorney General's office, DNR executive management, and/or staff experts as needed to re-evaluate previously identified concerns associated with the HCVF and ILO language in the existing PFA. If Version 3 of the PfA is released, consult with the internal groups identified in #2 to determine whether the new language has mitigated previously identified risks and/or evaluate any remaining risks against the risks brought on by not signing the self-declaration.	11 Nov 18
02	4.2b	MINOR	17 Oct 19	State law requires PPE to be worn at all times on logging operations. The surveillance audit found the Forest Manager was not enforcing the Timber	During the surveillance audit logging road construction crews in NISQUALLY VDT, VRH & RMZ were not wearing full PPE (hard hats, high vis) when the workers got out of their equipment. Interviews with DNR staff confirmed they were not	16 Oct 20	Closed	The DNR training committee has clarified proper PPE use by purchasers and contractors, communicated safety expectations with purchasers and contractors; and identified a range of compliance	23 Sept 20

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				<p>Sale contract that requires complying with all regulations and laws.</p>	<p>consistently enforcing health and safety requirements outlined in the Timber Sales contracts.</p> <p>State law regulation WAC 296-54 indicates logging operations, including road construction, must always have proper and appropriate PPE on "whenever there is the potential exposure to danger of flying or falling objects" unless they are in the equipment cab. There is an expectation with FSC certification that is clearly stated in the Guidance for Criteria 4.2 (i.e. PPE being worn) is demonstration that the Forest Manager is meeting and/or exceeding legal requirements. Auditors interviewed DNR staff and found they were unclear if they had authority to enforce health and safety requirements on sub-contractors. The audit was only able to visit one active operation and for this reason have graded the non-conformity as a minor.</p>			<p>options when working with contractors and subcontractors that scale with the severity of the problem. An updated statewide pre-work conference form has been developed to include a check of contractors' accident protection plans, discussion of relevant WACs, etc. During field inspection of Double Span Timber sale the auditor confirmed the presence of a pre-work conformance form noting safety elements. Direct observation and interview confirms potential safety hazards understood, full PPE in use and functions therein understood.</p>
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6.4 - Result regarding the resolution of complaints

Stakeholders reference (name / organisation / type)	Date	Received complaints	FSC criteria-indicator	Checked on site (YES or NO)	Answer (+Date)		
					Client	lead auditor	Bureau Veritas Certification
		None received by BVC or internal to DNR related to FSC					

6.5 - Result regarding previous observations

n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence	Status (closed, still open, upgraded to minor NC)	Evidences for closure
		None issued last audit			

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7 - Result of surveillance evaluations

MAIN ASSEMENT: 31 OCTOBER – 3 NOVEMBER 2017	
Number of NC closed	0
Pending NC	0
New NC raised	1
Certification Recommendation	certificate renewal
SURVEILLANCE 1: 8-11 OCTOBER 2018	
Number of NC closed	1
Pending NC	0
New NC raised	0
Certification Recommendation	continued certification
SURVEILLANCE 2: 15-17 OCTOBER 2019	
Number of NC closed	0
Pending NC	0
New NC raised	1
Certification Recommendation	continued certification
SURVEILLANCE 3: 22-24 SEPTEMBER 2020	
Number of NC closed	1
Pending NC	0
New NC raised	0
Certification Recommendation	continued certification
SURVEILLANCE 4 DATE	
Number of NC closed	
Pending NC	
New NC raised	
Certification Recommendation	

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

A closing meeting was held on 24 September 2020 remotely with DNR representatives present. Results and audits findings were presented by the lead auditor. These were not challenged. Confidentiality was assured. No controversial issues or contradictory evidence was raised.

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

8.1 - Records of Non-Conformities

No new non-conformities 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

8.2 - Records of observations

New observations raised during the audit, or pending

n°	Date recorded	Text of the OBSERVATION	Objective Opening evidence
5	24 Sept 20	<p><u>Notable practice:</u> DNRs cutting edge efforts coming out of Remotely Sensed Forest Resource Inventory System (RS-FRIS) using LIDAR and DAP will not only further refine their inventory system stand level attributes but will be able to clearly identify critical habitats with a much higher degree of accuracy than can traditional assessment methods. This is notable as DNR is far and away the forestry leader in the use of this technology.</p>	

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9 - Proposals regarding the certification decision

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.

10 - Certification decision

The Bureau Veritas Certification decides that the FSC FM certificate of the Washington State Department of Natural Resources (South Puget HCP Planning Unit) remains valid. There are no open non-conformities.

Issued the 20 December 2020, approved on 26.02.2021.

FM certification decision maker,

Lead Auditor,

Krzysztof Wypij

Jim Colla

11 - Appendices

- A. Checklist(s)
- B. Non-Conformance 02 form
- C. Documents remitted by the applicant and any additional information that permits to justify the reports or recommendations of the auditor