

**WHITE PAPER**  
**Sustainable Forestry Initiative**  
**Washington SFI State Implementation Committee (SIC)**  
**RE: Verifiable Auditing / Monitoring Program**

The Sustainable Forestry Initiative Program (SFI)<sup>SM</sup> assists forest landowners in meeting their sustainable forest management policies and objectives while assuring the public that participant's forests are being managed properly. Those embracing the SFI program must balance environmental compatibility of sound forestry operations with social responsibility and economic viability.

SFI verification and certification procedures measure participant's conformance with the SFI Standard. The process may include both first and second-party verification as well as independent third-party certification of conformance to the SFI Standard. After a comprehensive public review process in 2001, the Sustainable Forestry Board adopted an extensive set of changes to the SFI Standard, and the associated Verification Procedures. Changes to the program, including a new standard (SFI 2002-2004), became effective January 1, 2002. These changes have been incorporated into subsequent standards, including the current standard.

One of the most significant changes to the SFI Standard dealt with the procurement of wood fiber from sources other than participant owned lands. The SFI Standard requires participants who procure wood from other sources for their manufacturing facilities to have "a verifiable auditing or monitoring system in place to evaluate the results of promoting reforestation and use of Best Management Practices within wood supply systems, and use that information to set goals for continual improvement".

In 2001 the new SFI procurement requirements generated significant discussion among program participants within the state of Washington. Approaches and strategies for meeting the new requirements were discussed at a number of SFI State Implementation Committee (SIC) meetings. After thorough review, and meetings with Washington State Department of Natural Resources (DNR) representatives, the SIC felt there was sufficient evidence to conclude that DNR monitoring and enforcement activities, conducted to support the Washington Forest Practices Act, represent a "verifiable auditing or monitoring system" that yields information accessible to all SFI participants in the state, and can constitute compliance with the SFI Standard in that aspect. Those monitoring and enforcement activities are described as follows:

The DNR is responsible for the administration of the Washington Forest Practices Act, including the monitoring of compliance and effectiveness of the rules. Monitoring efforts can be divided into three categories: Routine Inspection and Enforcement, Compliance Monitoring, and Effectiveness Monitoring. These program elements identify the level of forest operations in compliance and utilize that information towards the goal of continual improvement. Required changes to the program may include clarification of rule language, improved administration of the rules, additional education and training, and/or rule modification.

## **Routine Enforcement**

DNR employs 47 Forest Practices Foresters (FPFs), stationed in 6 regional offices throughout the state. Each year the DNR receives and approves over 7,000 Forest Practice Applications (FPAs). Each FPA can have upwards of 50 pages of forms, maps and supporting technical and engineering documents. The actual level of detail required for each FPA is dependent upon the potential impact of the proposed harvest activity on the natural resources and can include preparation of an Environmental Impact Statement as defined by the State of Washington's State Environmental Policy Act (SEPA). DNR utilizes a screening process to determine the potential resource impacts of the FPA. Based upon that process, each application is assigned to one of four classes. The class of forest practice determines the amount of pre-harvest field review that is required. Many Class III and Class IV FPAs are field reviewed by the FPFs prior to FPA approval.

Additionally, the DNR's Forest Practices Application Review System (FPARS) makes use of the Internet, document imaging and management technology, interactive geographic information system technology, and the Oracle database system to provide for collection of Forest Practices Application information, distribution of Forest Practices Applications for regulatory and public review, risk assessment of proposed Forest Practices Application activities, and archiving of Forest Practices Applications. This system is open to the public.

Through a series of inspections and site visits, the FPFs work with landowners and operators to facilitate proper implementation or compliance with the forest practices rules. In addition, the DNR has created a Small Landowner Office (SLO) to assist small landowners in implementing the Forest Practice Rules. The SLO serves as a resource and focal point for small forest landowner concerns and policies. Currently DNR funds four SLO staff positions at the Olympia headquarters dedicated solely to assist small landowners. In addition to the headquarters staff, DNR provides funding for four positions working out of the regional offices to assist small landowners.

Not all operations can be inspected by FPFs, therefore operations are prioritized to determine inspection schedules and frequencies. FPFs are encouraged to focus their efforts where there is the highest risk to public resources while at the same time monitoring overall compliance across the landscape. Once approved, the DNR prioritizes their enforcement and monitoring activities based on potential resource impacts (FPA class). Most Class IV applications are monitored during or following harvest activities. The DNR has targeted a compliance review of 50% of Class III applications.

When rules are not properly implemented, enforcement programs are intended to ensure compliance with regulations in order to prevent damage to public resources. The State of Washington has established a set of education and enforcement steps, which progress through informal conferences, Notices to Comply (NTC), Stop Work Orders (SWO), civil or criminal penalties, Notice of Intent to Disapprove (NOID), financial assurances, and injunctions.

Records of Forest Practices enforcement documents including: Stop Work Orders (SWO), Notices to Comply (NTC), Notices of Intent to Disapprove (NOID), and Civil Penalties issued can be requested from the DNR Olympia office through the Public Disclosure process. These

requested documents can be queried to gauge the level of compliance. Not all Notices to Comply are violations. The DNR uses the NTC as a method of documenting requested changes to the FPA after the approval date.

### **BMP Compliance Monitoring**

While inspections and enforcement documents are valuable tools, a statistically reliable sample of BMP compliance is needed to determine if the compliance program is producing desired results and to identify methods to improve compliance. In support of this effort, the DNR has implemented a Forest Practice Compliance Survey to evaluate compliance with the forest practice rules and to determine the level of voluntary and cooperative efforts that benefit public resources.

In 1991, the Field Implementation Committee (FIC) reviewed 191 forest practice applications (FPAs) to determine compliance with forest practice rules. Forest Practice Applications were randomly selected for compliance assessment of a range of forest practices activities including: road construction, timber harvest, in-stream work, chemical application, voluntary efforts, protection of archaeological and cultural resources and conversions. Compliance for each specific forest practice ranged from a low of 41% (road maintenance) to a high of 86% (road construction). In 1993, DNR conducted a statewide assessment of FPAs relative to reforestation requirements and found very high conformance levels. Much of the information that resulted from these surveys was used to inform development of the Forest and Fish rules approved and implemented in 2000.

DNR is mandated by rule (Chapter 222-08-035 (4)) to conduct compliance monitoring and to report findings to the Forest Practices Board. Beginning late in 2003, DNR has accelerated the development of a new framework for compliance monitoring. Structured, annual monitoring began in mid-2004.

### **Effectiveness Monitoring**

Adaptive Management is included in the Forest Practices rules as a formal process to monitor and assess implementation of rules to determine if those rules achieve the desired resource protection objectives. This formal and structured process serves to: evaluate the current resource status; evaluate the effectiveness of rules and guidance in protection, maintenance, and enhancement of habitat necessary to meet established resource goals and objectives; for making adjustments to forest practices on a regional or statewide basis, and for requiring mitigation, where necessary, to achieve resource objectives.

The Cooperative Monitoring Evaluation and Research Committee (CMER) along with the Scientific Review Committee has established protocols and standards governing the Adaptive Management process. The intent of CMER is to advance the science needed to support adaptive management.

To evaluate the effectiveness of the Forests and Fish rules, CMER has implemented projects to evaluate the effectiveness and implementation of specific rules and regulations. Examples of the types of projects CMER is working on include, but are not limited to:

- ◆ Water Temperature – Several research projects have been designed or are currently being scoped to better predict the relationship between shade and temperature, test cumulative effects, analyze how local conditions affect stream temperature, and understand the effects of groundwater on stream temperature.
- ◆ LWD/Organic Inputs – Research projects have been designed or are being scoped to test the effectiveness of Forests and Fish rules regarding riparian protection and the contribution of the buffer to LWD recruitment.
- ◆ Sediment – Research projects focus on three main areas of sediment contribution; mass wasting, road sediment delivery, and streambank disturbance.
- ◆ Hydrology – The measure targets for hydrology research projects include; road run-off, peak flows, and wetlands.
- ◆ Chemical Inputs – Research is planned to focus around chemical inputs into water as well as entry into the RMZ.
- ◆ Wildlife- Research is ongoing to address the impact of riparian buffers on upland terrestrial wildlife and amphibians.

CMER Research Reports and current work plans are available on the DNR website.

The Washington SFI-SIC is confident that the DNR monitoring efforts outlined above do, in fact, meet SFI program standards requiring that SFI participants have “a verifiable auditing or monitoring program in place to evaluate the results of promoting reforestation and use of Best Management Practices within wood supply systems.

A reassessment of this conclusion was carried out in June 2010. The SIC will conduct periodic reassessments in the future to maintain the validity of this conclusion.

The following personnel agree this white paper represents an accurate description of the auditing and monitoring program in Washington State.

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Washington SFI SIC Chair      Date

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DNR Forest Practices Division      Date