

Interagency Forest Practices Audit 2020 Work Plan



**State of Idaho
Department of Environmental Quality
May 2020**

Executive Summary

In summer 2020, the Idaho Department of Environmental Quality (DEQ), with assistance from the Idaho Department of Lands (IDL), will audit 67 timber sales throughout Idaho. The audits will evaluate compliance with the Idaho Forest Practices Act and are a required part of the *Idaho Nonpoint Source Management Plan*. The final report will be completed by December 2020.

This work plan provides the project rationale, sampling schedule, and audit site locations.

To coordinate a site visit, or for more information about the 2020 audits, please contact:

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Regulatory Background

The Idaho Department of Environmental Quality (DEQ) is delegated authority for control of water pollution under the Clean Water Act; the Idaho Environmental Protection and Health Act of 1972 (Title 39, Chapter 1, Idaho Code); the Idaho Water Quality Act (Title 39, Chapter 36, Idaho Code); and the Water Quality Standards (IDAPA 58.01.02).

DEQ is the lead state agency for protecting beneficial uses and the level of water quality needed to sustain them. In addition, DEQ is the lead state agency for ensuring that high quality waters are maintained. DEQ is also the lead designated management agency for implementing Clean Water Act §319.

Silvicultural activities in Idaho are regulated by the Forest Practices Act (FPA) (IDAPA 20.02.01). The act applies to private, state, and federal timberlands and implements the goals and objectives of the *Idaho Nonpoint Source Management Plan* (DEQ 2015).

The Idaho Department of Lands (IDL) is responsible for implementing the Forest Practices Act and ensuring compliance with its management prescriptions. DEQ is responsible for ensuring the act provides adequate protection to surface water. To this end, DEQ conducts audits of the state's timber harvests every 4 years.

In 2020, DEQ and IDL renewed a memorandum of understanding (MOU) with the US Forest Service and US Bureau of Land Management. In the MOU, the agencies agreed to work together to conduct the quadrennial audit of timber sales in the state (DEQ 2020). DEQ committed to coordinate and chair the statewide audit every fourth year.

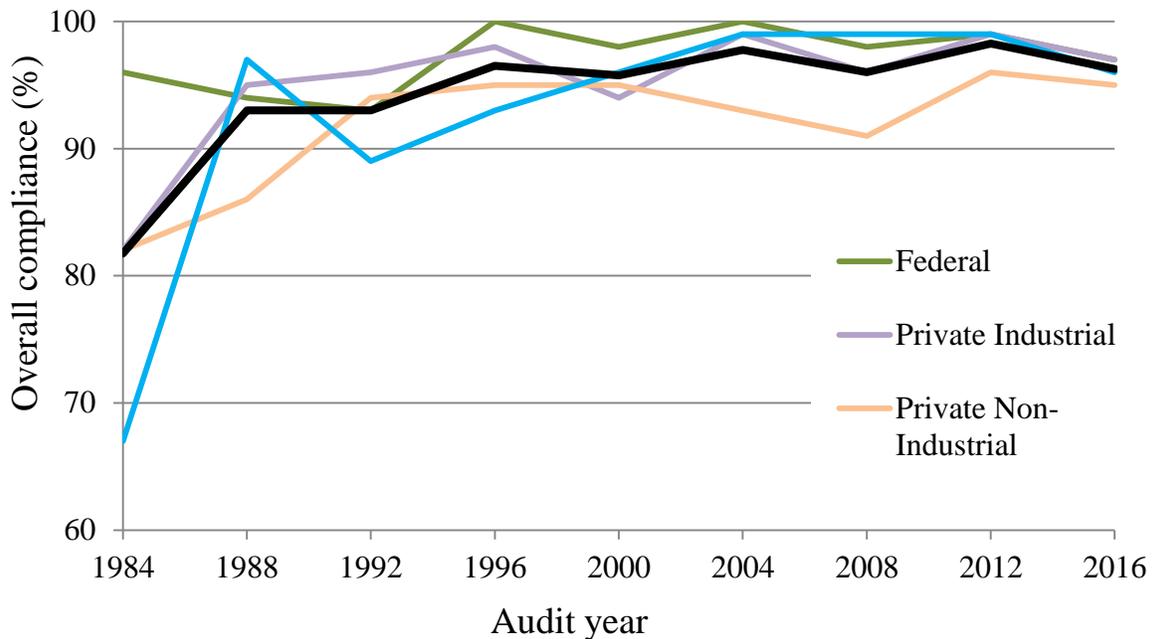
The audit checks compliance with FPA rules and examines active and recently completed harvesting operations across the state on federal, state, and private ownerships. Landowners, forestry operators, and other interested parties, including the public, are invited to participate in these audits. Participation is at the discretion of the landowner and must be arranged in advance.

In accordance with the federal Clean Water Act, DEQ administers Idaho's water quality standards as well as the *Idaho Nonpoint Source Management Plan*. The corresponding nonpoint source silvicultural best management practices are also monitored by DEQ in the quadrennial audit.

The MOU requires DEQ to suggest—and IDL to evaluate—modifications to FPA rules that do not appear to be providing adequate protection of water quality. Following the audits, DEQ makes recommendations to the Forest Practices Act Committee and IDL. These recommendations, which may include administrative rule changes or additions, are then moved toward corresponding rule promulgation following extensive reviews and analyses. These recommendations ensure that Idaho's BMPs and rules are based on the best available science.

History

Audits have been conducted every 4 years since 1984. The 2008 and 2012 audits were also used to develop a new riparian harvest rule (the “Shade Rule” IDAPA 20.02.01.030.07.e). The audits have demonstrated an increasing degree of compliance with the FPA, as shown in the figure below. The 2016 audit reflected high rates of rule compliance. The overall rate of observed rule compliance for the federal, private industrial, and state audited sites was 96%. The overall rate of rule compliance on the nonindustrial private audited sites was 95%.



Purpose of this Work Plan

This work plan provides a brief overview of the audit process, field plan for 2020, and objectives for the audits. It is the primary communication vehicle to explain the chosen audit sites. It also provides a calendar so interested parties can observe the audits. Finally, it explains the pilot project that is being undertaken.

Further information can be obtained from the quality assurance project plan (DEQ 2020).

2020 Goals

The goals of the 2020 audits are as follows:

1. Assess the extent to which FPA rules are being followed in each ownership category.
2. Compare these results with previous audits.
3. Determine whether FPA rules are effective in protecting stream habitat.

4. Recommend rule and administrative procedure revisions, if indicated by the audit findings.

The audit's compliance component will be conducted as a statewide assessment of whether the FPA rules (IDAPA 20.02.01) are being implemented and maintained. Therefore, although the audit is comprised of individual timber sales, our recommendations will be statewide in scope.

To allow comparison with previous audits, many things have been kept constant, including the following:

- Approximately the same number of primary audit sites
- Same division between ownership types
- Same field audit partnership between DEQ and IDL

The previous auditors from both IDL and DEQ will be conducting the 2020 audit.

Improvements

The quadrennial audit is an ongoing, constantly improving process. The following changes have been made since the 2012 audits:

1. In addition to the 40 primary sites, 24 sites from the previous audit cycle will be revisited, which will allow for the following:
 - a. An assessment of the medium-term effectiveness of the FPA rules.
 - b. Inclusion of replanting and road maintenance rules.
2. The audit site panel will be comprised of *all* timber sales that meet the criteria of size and proximity to water. Previously, only inspected sales were used.
3. Electronic field forms will be used to collect the audit data. Paper forms will be available as a backup.
4. Non-routine sites will be visited, but not included in the audit. These include sites with a riparian variance, and those harvested under fire emergencies.

Sample Site Selection

The pool of potential audit sites is all timber sales in Idaho that meet the following criteria:

1. Must contain a total cutting area of at least 5 acres.
2. Must contain a minimum of 500 feet of Class I (fish-bearing) stream within or bordering its cutting units.
3. Forest practice activities must have occurred since January 2018. Active timber sales are included in the audit panel.

DEQ collected information on federal timber sales. IDL collected information on state and private timber sales. The DEQ and IDL sites were combined into one list. From this list, the actual audit sites were chosen by DEQ.

Types of Sites—Stratifiers

Primary sites were randomly chosen considering the following factors:

- The initial 40 sites should be divided evenly between each ownership type: 10 federal, 10 state, 10 private industrial, and 10 private nonindustrial.
- Each federal entity (meaning each National Forest and each BLM district) should feature at least one site.
- Each IDL supervisory area (10 total) should feature at least two non-federal sites.

Revisit sites were chosen based on those that were not adequately replanted at the time of the previous audit. This led to 24 sites.

Special sites were chosen based on unique information about the site, such as whether it had a riparian variance. These sites will not be included in the final audit compliance rate, because their selection was not random.

Several backup sites were also identified in case several of the initial sites were inaccessible.

Actual Sites Chosen

The following sites have been chosen for auditing in the 2020 cycle:

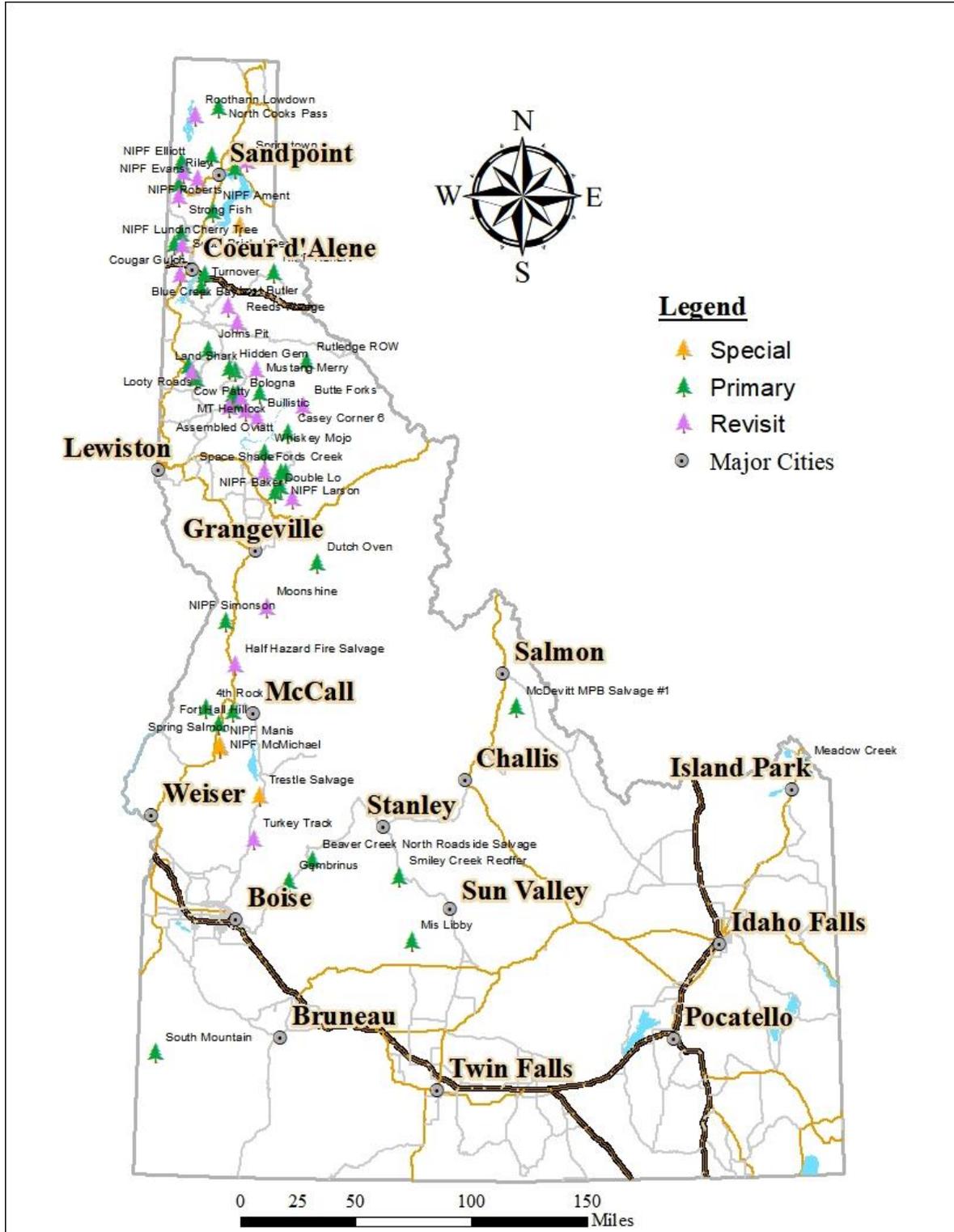
Sale Name	Notification #	Owner Type	Administrative Area
Fort Hall Hill	n/a	Federal	BLM - Boise district
Blue Creek Bay	n/a	Federal	BLM - Coeur d'Alene district
Half Hazard Fire Salvage	n/a	Federal	BLM - Coeur d'Alene district
Double Lo	n/a	Federal	BLM - Cottonwood field office
McDevitt MPB Salvage #1	n/a	Federal	BLM - Idaho Falls district
Beaver Cr. N. Roadside Salvage	n/a	Federal	Boise NF
Meadow Creek	n/a	Federal	Caribou-Targhee NF
Casey Corner 6	65119C	IPF	Clearwater
Butte Forks	47901C	IPF	Clearwater
Whiskey Mojo	50119C	STATE	Clearwater
Surprise Creek Fire	n/a	Federal	Idaho Panhandle NF
Jasper II GNA	n/a	Federal	Idaho Panhandle NF
Fords Creek	48003C	IPF	Maggie Creek
NIPF Baker	53259C	NIPF	Maggie Creek
NIPF Larson	56488C	NIPF	Maggie Creek
NIPF Kleinsmith	56331C	NIPF	Maggie Creek
Space Shade	53670C	STATE	Maggie Creek
Turnover	62829C	IPF	Mica
Cherry Tree	49029C	IPF	Mica
NIPF Lundin	57795C	NIPF	Mica
NIPF Rehart	62106C	NIPF	Mica
South Brickel Cedar	57836C	STATE	Mica

Sale Name	Notification #	Owner Type	Administrative Area
Cougar Gulch	48803C	STATE	Mica
Lost Butler	49013C	STATE	Mica
Dutch Oven	n/a	Federal	Nez Perce-Clearwater NF
Moonshine	n/a	Federal	Nez Perce-Clearwater NF
Trestle Salvage	54057C	IPF	Payette Lakes
Spring Salmon	54003C	IPF	Payette Lakes
NIPF Manis	54049C	NIPF	Payette Lakes
NIPF McMichael	54048C	NIPF	Payette Lakes
NIPF Simonson	54012C	NIPF	Payette Lakes
4th Rock	n/a	Federal	Payette NF
Strong Fish	48876C	IPF	Pend Oreille Lake
NIPF Evans	59537C	NIPF	Pend Oreille Lake
NIPF DH & EH	59808C	NIPF	Pend Oreille Lake
NIPF Ament	00546C	NIPF	Pend Oreille Lake
NIPF Roberts	51848C	NIPF	Pend Oreille Lake
Riley	51822C	STATE	Pend Oreille Lake
North Cooks Pass	000470	STATE	Pend Oreille Lake
Springtown	51430C	STATE	Pend Oreille Lake
Cow Patty	54506C	IPF	Ponderosa
Bologna	47980C	IPF	Ponderosa
North Crossing	58839C	IPF	Ponderosa
Middle Prospect	48453C	IPF	Ponderosa
NIPF Smith	58830C	NIPF	Ponderosa
Bovill Cleanup	058797C	STATE	Ponderosa
Assembled Oviatt	48381C	STATE	Ponderosa
Bullistic	48380C	STATE	Ponderosa
Purdue Cedar	58796C	STATE	Ponderosa
Last Big Chance	58746C	STATE	Ponderosa
NIPF Elliott	60076C	NIPF	Priest Lake
Selkirk Powder	54947C	STATE	Priest Lake
Roothann Lowdown	54807C	STATE	Priest Lake
Mis Libby	n/a	Federal	Sawtooth NF
Smiley Creek Reoffer	n/a	Federal	Sawtooth NF
Gambrinus	001035	IPF	Southwest
South Mountain	64010C	STATE	Southwest
Turkey Track	49533C	STATE	Southwest
Mustang Merry	50446C	IPF	St. Joe
MT Hemlock	000800	IPF	St. Joe
Land Shark	000987	IPF	St. Joe
Hidden Gem	62798C	IPF	St. Joe
Looty Roads	62617C	IPF	St. Joe
Reeds Wedge	50246C	IPF	St. Joe
Rutledge ROW	000670	IPF	St. Joe
Johns Pit	000899	STATE	St. Joe

Note: NF = national forest, IPF = industrial private forest, NIPF = nonindustrial private forest.

Map

An interactive map of the audit sites is also available on DEQ's website (www.deq.idaho.gov/forest-practices-audits).



Tentative Calendar

This monitoring calendar is published to aid interagency participation with the audits. We welcome any interested party to observe the audit, with the permission of the landowner. The most up-to-date version of the calendar will be available on the DEQ website. The dates are firm but are subject to change in response to unpredictable events such as fires and road closures. Please contact DEQ or IDL to arrange a site visit date.

MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
May 18 South Mountain <i>Jordan Valley</i>	19 Gambrinus Turkey Track <i>Banks</i>	20 Trestle Salvage <i>Smiths Ferry</i>	21 Spring Salmon <i>McCall area</i>	22 Half Hazard <i>Riggins</i>
May 25	26	27	28	29
June 1 Moonshine <i>McCall</i>	2 Fort Hall Hill <i>McCall</i>	3 4 th Rock <i>McCall</i>	4 Manis McMichael <i>Council</i>	5 Simonson <i>Riggins</i>
June 8	9 Double LO <i>Kamiah</i>	10 Dutch Oven <i>Kamiah</i>	11 Baker <i>Kamiah</i>	12
June 15 Smith Cow Patty <i>Bovill</i>	16 Bovill Cleanup Assembled Oviatt Bullistic <i>Bovill</i>	17 Bologna Mustang Merry <i>Bovill</i>	18 MT Hemlock <i>Bovill</i>	19 Purdue Cedar <i>Bovill</i>
June 22	23	24	25	26
June 29 Evans Riley <i>Priest River</i>	30 North Cooks Pass <i>Sandpoint</i>	1 Selkirk Powder <i>Sandpoint</i>	2 Surprise Cr. Fire <i>Athol</i>	3 DH + EH Springtown <i>Sandpoint</i>
July 6	7	8	9	10
July 13 Turnover <i>Potlatch</i>	14 North Crossing Middle Prospect <i>Potlatch</i>	15 Last Big Chance <i>Potlatch</i>	16 Hidden Gem Land Shark <i>Potlatch</i>	17 Looty Roads <i>Potlatch</i>
July 20	21	22	23	24

July 27 Meadow Creek <i>Island Park</i>	28 Mis Libby <i>Ketchum</i>	29 Beaver Creek <i>Stanley</i>	30 Smiley Reoffer <i>Stanley</i>	31 McDevitt <i>Salmon</i>
August 3	4	5	6	7
August 10	11	12	13	14
August 17	18	19	20	21
August 24 South Brickel Cedar Cherry Tree <i>Coeur d'Alene</i>	25 Lundin Ament <i>Coeur d'Alene</i>	26 Elliot Roothaan LD <i>Coolin</i>	27 Jasper II GNA <i>Coolin</i>	28 Roberts Strong Fish <i>Priest River</i>
August 31	1	2	3	4
September 7 Cougar Gulch Lost Butler <i>Coeur d'Alene</i>	8 Blue Creek Bay <i>Coeur d'Alene</i>	9 Rehart Reeds Wedge <i>St. Maries</i>	10 Rutledge ROW <i>St. Maries</i>	11 Johns Pit CT <i>St. Maries</i>
September 14	15	16	17	18
September 21 Whiskey Mojo <i>Orofino</i>	22 Casey Corner 6 Butte Forks <i>Orofino</i>	23 Larson Kleinsmith <i>Orofino</i>	24 Space Shade <i>Orofino</i>	25 Fords Creek <i>Pierce</i>

Methods

The audits will assess compliance with every applicable FPA rule at each site. The audit team will walk all roads and examine all stream crossings within each sale. If the sale includes multiple cutting units, each unit will be examined.

For each FPA rule, a rating of ‘complied’ or not ‘complied’ will be assigned. Comments about the effectiveness of the rule or management practices will be included and used to recommend future improvements.

Reports

DEQ is responsible for writing the final audit report. It will be published by December 31, 2020. The report will identify the compliance rate for each class of timber sale. It will not identify individual timber sales.

Pilot Projects

The quadrennial audit is often paired with a pilot project. In 2020, eDNA samples will be collected from up to 30 ‘class 2’ streams. A class 2 stream is one that does not contain fish, and is accordingly offered less protection by the FPA rules. Identification of class 2 streams is made by the landowner and IDL, using visual observation, electrofishing, and outside data. The accuracy of this identification will be confirmed using eDNA samples. The purpose of this information is to evaluate the efficacy of the current system.

QA/QC

The quality assurance project plan is available from DEQ (DEQ 2020), and on the website. Ian Wigger of DEQ is the quality assurance officer and will conduct one or more site visits to ensure the audits are accurate and repeatable.

Safety

DEQ and IDL assign top priority to the safety of their audit crew. This is especially important during the time of the coronavirus.

All work performed by DEQ personnel will be conducted in accordance with the *Idaho General Safety and Health Standards* (Division of Building Safety 2006).

Furthermore, the audit team will:

1. Be certified in first aid and CPR.
2. Carry first aid kits, fire extinguishers, and emergency contact tools such as radios, locator beacons or satellite telephones.
3. Be experienced working around water.
4. Wear hard hats and safety vests if auditing an active harvest operation.
5. Wear sturdy footwear.
6. Maintain six feet of distance between personnel.
7. Travel alone in vehicles wherever possible.
8. Wear face masks when appropriate.

When selecting accommodation, it is preferred that staff will base out of one location each week, rather than move every day. Accommodation that provides kitchen facilities will reduce the need to visit restaurant. If all three meals can be prepared in a kitchen, it will drastically reduce the amount of social interactions. Vacation houses (“Airbnb”) are a suitable accommodation

choice, and can usually be obtained for the regular state lodging rate of \$94 per person. On rare occasions when the rates are higher, staff should prioritize safety.

Staff should be able to select the travel method that they are most comfortable using. This may entail longer drives than usual.

References

- DEQ (Idaho Department of Environmental Quality). 2015. Idaho Nonpoint Source Management Plan. Boise, ID: DEQ. Available at www.deq.idaho.gov/water-quality/surface-water/nonpoint-source-pollution/idahos-nps-management-program.
- DEQ (Idaho Department of Environmental Quality). 2020. *Quality Assurance Project Plan – 2020 Forest Practices Audit*. TRIM reference 2020AKL56.
- Division of Building Safety. 2006. “Idaho General Safety and Health Standards,” revision 3. Meridian, ID: Division of Building Safety in cooperation with the Idaho Industrial Commission. Available at http://dbs.idaho.gov/safety_code/index.html.
- USDA Forest Service 2020. Memorandum of Understanding between the Idaho Department of Environmental Quality, Idaho Department of Lands, US Department of Interior, Bureau of Land Management, and the USDA Forest Service Northern and Intermountain Regions. TRIM reference 2020AKL65