

Interagency Forest Practices Audit 2024 Work Plan



**State of Idaho
Department of Environmental Quality
May 2024**

Executive Summary

In summer 2024, the Idaho Department of Environmental Quality (DEQ), with assistance from the Idaho Department of Lands (IDL), will audit 58 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 2024.

In addition, DEQ will evaluate riparian shade recovery on 26 sites that were part of a previous shade study.

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

To coordinate a site visit, or for more information about the 2024 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 Rules Pertaining to the Idaho Forest Practices Act (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 2020).

The Idaho Department of Lands (IDL) is responsible for implementing the Forest Practices Act (FPA) 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.

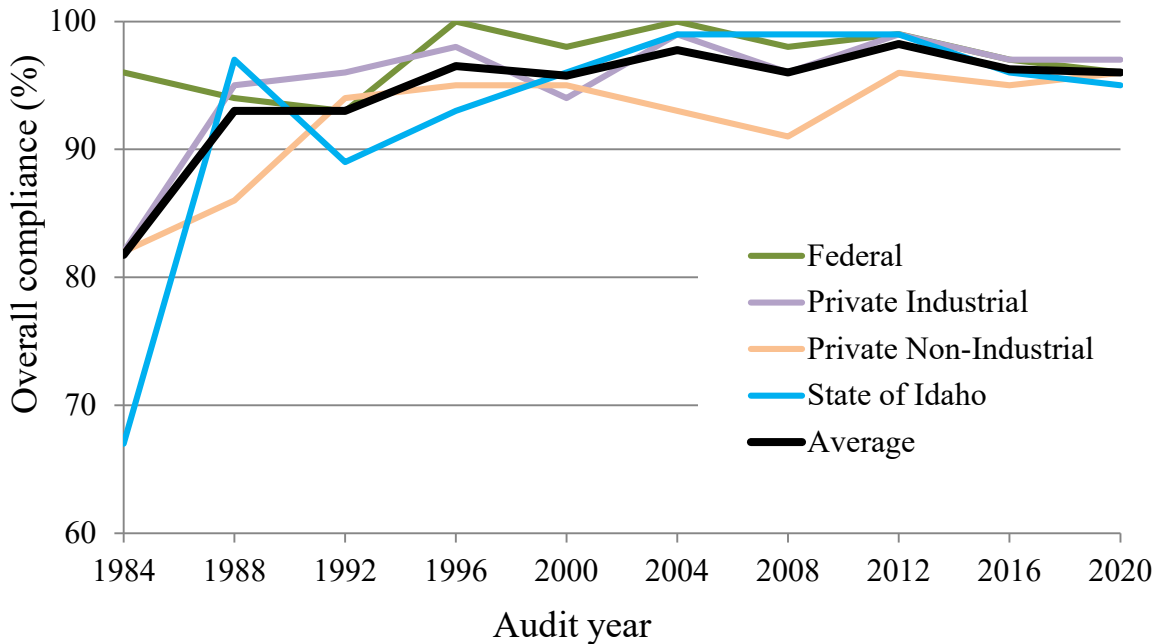
In 2020, DEQ and IDL renewed a memorandum of understanding (MOU) with the US Forest Service and US Bureau of Land Management. In the MOU, the agencies agreed to work together to conduct the quadrennial audit of timber sales in the state (USFS 2020). DEQ committed to coordinate and chair the statewide audit every fourth year. The audit checks compliance with Forest Practices Act 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 audits have demonstrated a generally increasing degree of compliance with the FPA, as shown in the figure below. The 2020 audit reflected high rates of rule compliance: 95% or above for each of the four ownership categories. Audits also regularly suggest improvements to FPA rules and their enforcement; in 2020, recommendations included paying special attention to maintenance debris, properly screening water diversions, and fixing a problem with the rule variance process.



Purpose of this Work Plan

This work plan provides a brief overview of the audit process, field plan for 2024, and objectives for the audits. It is the primary communication vehicle to explain the chosen audit sites. It also provides a draft calendar so interested parties can observe the audits. Finally, it explains the shade monitoring that is being undertaken concurrently with the audits.

Further information on the shade monitoring component can be obtained from the quality assurance project plan (DEQ 2024).

2024 Goals

The goals of the 2024 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. 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 categories
- Same field audit partnership between DEQ and IDL
- The DEQ and IDL auditors will be the same people as in 2016 and 2020

Sample Site Selection

The pool of 43 primary potential audit sites is all timber sales in Idaho that meet the following criteria:

1. Must contain a total disturbance area of at least 5 acres.
2. Must contain or have the potential of affecting a class I (fish-bearing) stream.
3. Were, or will be, active between January 2022 and August 2024.

In addition, sites that were previously audited in the 2012, 2016, or 2020 cycles were included in the 15-site revisit panel, to allow for assessment of the replanting and road maintenance rules.

DEQ collected information on federal timber sales by contacting the Forest Service and Bureau of Land Management regional offices. IDL collected information on state and private timber sales by querying its 'compliance' database. The federal, state and private sites were combined into one list. From this list, the actual audit sites were chosen by DEQ.

Types of Sites—Stratifiers

Primary sites (43) were randomly chosen considering the following factors:

- The sites were divided evenly between each ownership type: 11 federal, 11 state, 11 private industrial, and 10 private nonindustrial.
- Each federal entity (meaning each National Forest and each BLM district) featured at least one site.
- Each IDL supervisory area (10 total) featured at least two state or private sites.

Revisit sites were chosen based on those that were not adequately replanted at the time of the previous audit, or that had not previously been revisited. Proximity to primary sites was also considered. This led to 15 revisit sites from previous audit cycles.

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 2024 cycle:

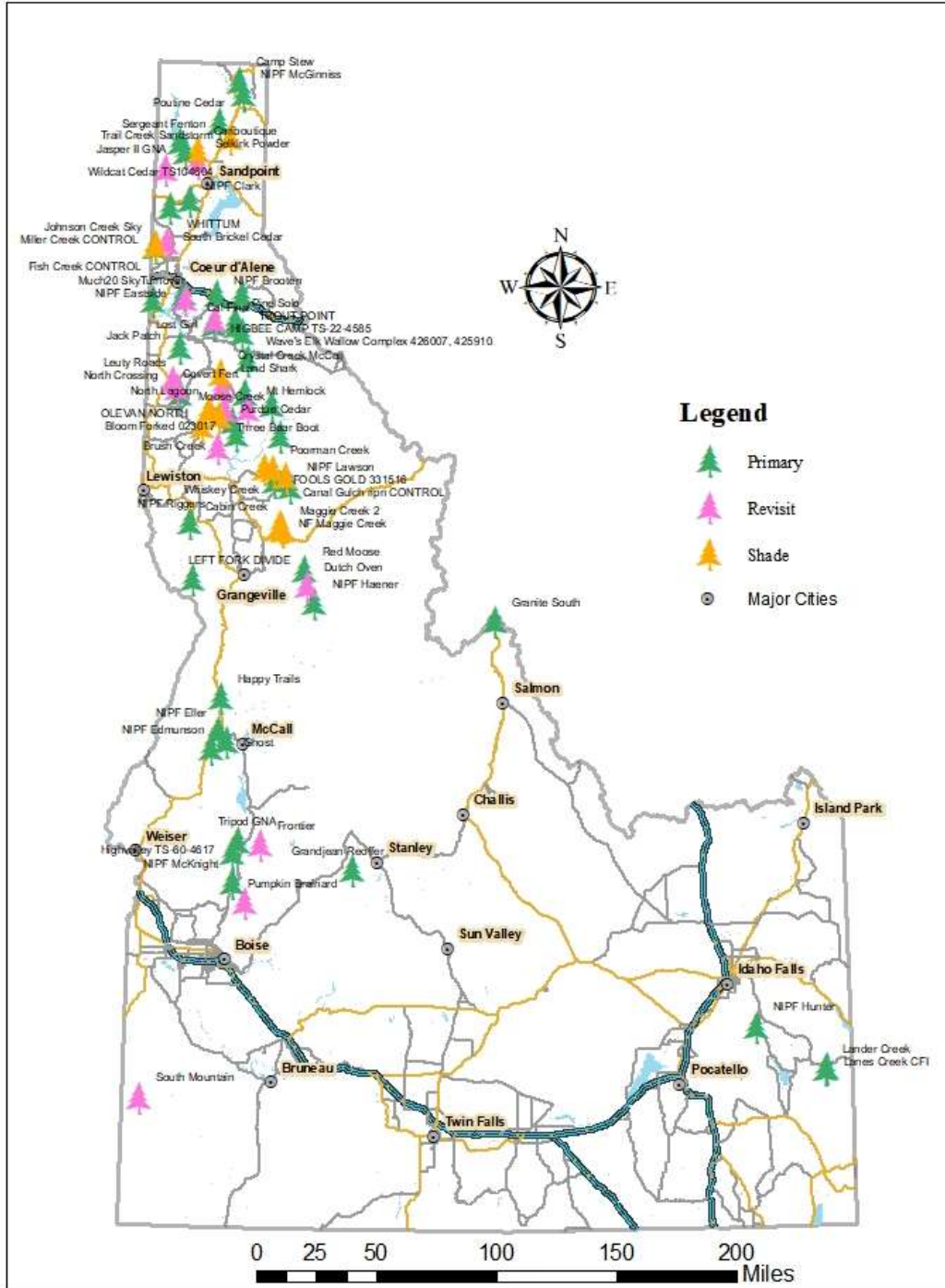
Sale Name	Notification #	Owner Type	Administrative Area
Pine Solo	n/a	Federal	BLM - Coeur d'Alene District
Happy Trails GNA	n/a	Federal	BLM - Cottonwood Field Office
Pumpkin Brainard	n/a	Federal	BLM - Boise District
Lander Creek	n/a	Federal	BLM - Idaho Falls District
Frontier	n/a	Federal	Boise NF
Tripod GNA	n/a	Federal	Boise NF
Lanes Creek	n/a	Federal	Caribou-Targhee NF
NIPF Brooten	12264	NIPF	IDL Cataldo
Lower Hazendorf	06202	State	IDL Cataldo
Cal Final	11775	State	IDL Cataldo
Higbee Camp	07166	State	IDL Cataldo
Lost Girl	unknown	State	IDL Cataldo
Silver Town Row	11546	IPF	IDL Clearwater
Fools Gold	06426	IPF	IDL Clearwater
Left Fork Divide	06585	IPF	IDL Craig Mountain
NIPF Riggers	12910	NIPF	IDL Craig Mountain
NIPF Hunter	12200	NIPF	IDL Eastern Idaho
Jasper II GNA	n/a	Federal	Idaho Panhandle NF
Camp Stew	n/a	Federal	Idaho Panhandle NF
NIPF McGinniss	07416	NIPF	IDL Kootenai Valley
Poutine Cedar	11397	State	IDL Kootenai Valley
NIPF Haener	07003	NIPF	IDL Maggie Creek
NIPF Lawson	06806	NIPF	IDL Maggie Creek
Johnson Creek Sky	12024	IPF	IDL Mica
Turnover	62829C	IPF	IDL Mica
Much20 Sky	12256	IPF	IDL Mica
NIPF Eastside	07583	NIPF	IDL Mica
Miller Cedar	06289	State	IDL Mica
S. Brickel Cedar	57836c	State	IDL Mica
Dutch Oven	n/a	Federal	Nez Perce-Clearwater NF
Red Moose	n/a	Federal	Nez Perce-Clearwater NF
NIPF Edmunson	11926	NIPF	IDL Payette Lakes
NIPF Eller	11404	NIPF	IDL Payette Lakes
Ghost	n/a	Federal	Payette NF
Whittum	07489	IPF	IDL Pend Oreille Lake
NIPF Clark	11274	NIPF	IDL Pend Oreille Lake
Bloom Forked	65554C	IPF	IDL Ponderosa

Sale Name	Notification #	Owner Type	Administrative Area
Three Bear Boot	47933	IPF	IDL Ponderosa
North Crossing	58839C	IPF	IDL Ponderosa
Olevan North	65532C	IPF	IDL Ponderosa
Milwaukee Line	11001	State	IDL Ponderosa
Purdue Cedar	58796C	State	IDL Ponderosa
Wildcat Cedar	06913	State	IDL Priest Lake
Selkirk Powder	54947C	State	IDL Priest Lake
Sergeant Fenton	12379	State	IDL Priest Lake
Granite South	n/a	Federal	Salmon-Challis NF
Grandjean Reoffer	n/a	Federal	Sawtooth NF
NIPF McKnight	06726	NIPF	IDL Southwest
South Mountain	64010	State	IDL Southwest
Highvalley	64016C	State	IDL Southwest
Land Shark	00987	IPF	IDL St. Joe
Wave's Elk Wallow	11667	IPF	IDL St. Joe
Covert Fert	12721	IPF	IDL St. Joe
Mt Hemlock	00800	IPF	IDL St. Joe
Jack Patch	12210	IPF	IDL St. Joe
Leuty Roads	62617C	IPF	IDL St. Joe
Trout Point	06694	State	IDL St. Joe
Verpasst Cedar	12070	State	IDL St. Joe
Pine Solo	n/a	Federal	BLM - Coeur d'Alene District
Happy Trails GNA	n/a	Federal	BLM - Cottonwood Field Office
Pumpkin Brainard	n/a	Federal	BLM - Boise District
Lander Creek	n/a	Federal	BLM - Idaho Falls District
Frontier	n/a	Federal	Boise NF
Tripod GNA	n/a	Federal	Boise NF
Lanes Creek	n/a	Federal	Caribou-Targhee NF
NIPF Brooten	12264	NIPF	IDL Cataldo

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

Map

An interactive map of the audit sites is also available on the audit website (www.deq.idaho.gov/forestry).



Field Procedure

An audit shall consist of field observation of a timber sale, usually after the harvesting is complete. The audit team, consisting of one DEQ and one IDL staff person, shall observe the entire substantive area of the timber sale. If the sale includes multiple cutting units, each unit will be examined. The team should attempt to walk every road and skid trail, and inspect every culvert. The team must visit every Class I stream crossing.

The audits will assess compliance with every applicable FPA rule at each site. At each location where a rule is applicable, the audit team will decide whether the rule has been complied with. 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. The team will discuss each situation, and attempt to be unanimous in their opinion. Disagreements will be noted on the field form. If disagreements are not resolved, the DEQ staff member’s opinion will be used in the final audit report, but the dissenting opinion will be noted and elaborated.

Fieldwork quality will be controlled by following the audit form during each sampling event, and referring to the rule text and if necessary, IDL rule guidance for evaluating each question.

Calendar

A tentative 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 first audit will be on May 20, 2024, and the last will be on October 11, 2024, with none in the month of August. The most up-to-date version of the calendar is available at www.deq.idaho.gov/forestry. 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.

Reports

DEQ is responsible for writing the final audit report. It will be published by December 31, 2024. The report will identify the compliance rate for each class of timber sale. It will not identify individual timber sales. Recommendations about rule improvements and implementation will be included in the report.

Pilot Study: Shade Sites

The quadrennial audit is often paired with a pilot project. For example in 2020, eDNA sampling assessed the accuracy of stream classification. In 2024, data will be collected to assess the rate of shade recovery after riparian harvest.

In 2017-2019, DEQ and IDL conducted a ‘shade study’ to determine whether the riparian harvest rules preserved acceptable levels of shade. These riparian sites were harvested to the maximum

extent permissible by rule, and extremely detailed shade measurements were taken pre- and post-harvest. Now, six years later, repeat shade measurements will show how completely shade has recovered. Of the original site panel, 56 were used in the study. Some of these sites are no longer appropriate for comparison, having been affected by adjacent timber harvest or wildfire. There are approximately 26 sites suitable for re-measurement.

The audit team will attempt to measure shade at as many of these sites as time allows. The locations and method used will be identical to that in the original study to enable a true comparison.

A plan and budget for analyzing the shade data have not been established yet, but the travel schedule of the audits is an excellent opportunity to collect the data.

Quality Assurance

The audit, being a series of ‘pass/fail’ questions, combined with professional judgement, is not suitable for a traditional quality assurance plan. Bias will be minimized by careful creation of the audit forms, such that they address and clearly state every applicable forest practices act rule. If questions of interpretation arise, the plain text of the rule will be consulted, followed by the IDL guidance. Furthermore, each audit will be conducted with at least two auditors, who shall agree on each decision, or document their disagreement.

The shade pilot study has its own quality assurance project plan (Keefe 2016; 2024AKL13).

Safety

DEQ and IDL assign top priority to the safety of their audit crew.

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 trained 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. Wear face masks when appropriate.

Any visitors will also wear appropriate safety equipment and receive a safety briefing from the forester or landowner.

Personal protective equipment (PPE) necessary to perform the field work for this project shall be consistent with the requirements of the *Idaho General Safety and Health Standards* (Division of Building Safety 2006) and all project-specific health and safety plans associated with the project.

In addition to these PPE requirements, the following specific PPE is required for field work associated with this project:

- Sturdy footwear
- Hard hat and high-visibility vest for active timber sales
- First aid kit, to be kept in the vehicle

References

DEQ (Idaho Department of Environmental Quality). 2020. Idaho Nonpoint Source Management Plan. Boise, ID: DEQ. Available at www.deq.idaho.gov/water-quality/surface-water/nonpoint-source-management-program/

Keefe, R.; Link, T.; Dunnette, P.; Becker, R.;(University of Idaho). 2016. Monitoring shade recovery after Idaho’s Class I Stream Harvest: Quality Assurance Project Plan. Revised April 2024 by Idaho DEQ. TRIM reference 2024AKL13

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