

DRAFT Hydraulic Project Approval (HPA) Administrative Review Audit

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BACKGROUND

In September 2005, Washington Department of Fish and Wildlife (WDFW) began an effort to develop a protocol for conducting administrative audits of Hydraulic Project Approvals (HPA) issued in each of WDFW's six regions. This effort was initiated based on the need to evaluate the consistency in application of the HPA rules and to assess the benefits to fish, shellfish, and their habitats achieved through implementation of the HPA program.

In February 2006, this effort was initiated in Region 6 as a pilot audit and region staff developed a three-tiered protocol for permit evaluation. The audit looked at administrative procedures (HPA, Hydraulic Permit Management System (HPMS), agency policies), applicant compliance with HPA provisions, and biological effectiveness of HPA permits in protecting fish and fish habitat.

Due to the large scope of this evaluation, the WDFW Habitat Program Science Division assisted in planning the audit, and was responsible for developing data collection protocols and analyzing data associated with compliance and biological effectiveness. Region 6 produced an audit form to use in evaluating administrative procedures (Appendix A) and the Science Division produced an audit form to use in conducting site evaluations of compliance and biological effectiveness. Throughout July and August 2006, WDFW staff conducted the administrative section of this audit. On July 26, 2006, the compliance and biological effectiveness forms were field-tested and minor revisions were incorporated. Field reviews of HPA projects were completed by the end of October 2006. The following paper addresses only the administrative portion of the audit. The compliance and effectiveness components of the audit are addressed in a separate report.

METHODS

WDFW Region 6 issues about 1,200 HPA permits each year. Originally, an audit was planned for 10 percent of all HPA permits issued by the region after December 1, 2005, with completion on or before June 30, 2006. These dates were chosen to coincide with the implementation of the new Hydraulic Project Management System (HPMS), WDFW's database for tracking and issuing HPAs. The initial population of targeted HPA permits totaled 299, including 175 for freshwater projects, 40 for marine projects, and 14 for estuarine projects. The remaining 70 projects were revisions of existing HPAs; not standalone projects, and were not included in the sample. After reviewing project types, as well as provisions and designs that could be field verified, the audit was limited to four project types: water crossing structures (culverts), freshwater bank protection, marine bank protection, and marine over-water structures. This new population totaled 260 permits that were evaluated for usability in this study. Although the goal was to include 30 or more permits from each project category, suitable freshwater permits included 29 water crossing structures and 16 bank protection projects, and suitable marine permits included 17 bank protection projects and 9 over-water structure projects. Several of these were subsequently removed because they did not meet survey criteria, such as correct project type or appropriate project dates.

The final number of HPA permits used in this study was 59, including 34 freshwater and 25 marine water projects. Permits were combined for the administrative audit into freshwater and marine projects because there are similar requirements for these project types. There is a

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difference, however, in how projects in these two environments are reviewed based on additional requirements from other agencies that impact project design and documentation.

To conduct the administrative audit, a series of 21 questions was developed to address the following:

- When an application was reviewed, was information on the application correctly identified and recorded, and was correct action taken as a result of this review?
- When the information was entered into HPMS, was this done correctly and was back-up information sent to WDFW headquarters in Olympia?
- When the HPA was written, did it meet legal requirements, were the provisions understandable, and was it written clearly?

The first set of questions addressed the requirements for a complete application, including State Environmental Policy Act compliance, project plans, signatures, and dates. This series of questions was also designed to evaluate if actions taken by WDFW employees adhered to program policies and procedures, including identifying complete versus incomplete applications and notifying applicants of the status of their application (incomplete, on hold, or other problems).

The second set of questions identified whether information in HPMS and in the hard copies of applications (including plans and other supporting documents) accurately related to content of the HPA permit. These questions helped to determine if the paper records and supporting documents, including pictures, environmental engineering reports, other communication such as email exchanges, and mitigation agreements were consistent.

The third set of questions identified whether provisions were generally appropriate to the project type, complete, not redundant, and not ambiguous. The general organization of the provisions, spelling, and grammar were also noted. Some employees were interviewed for their impressions of why identified errors occurred.

RESULTS

Application Review

Before a review of applications could start, back-up documents housed at WDFW headquarters in Olympia were needed for review in order to compare information in the applications to data in the HPMS system. Of the 59 applications that were reviewed, only 50 had back-up documents in Olympia. Of these 50, only 38 had adequate documentation to review the HPMS record. For purposes of this audit, if biologists had sent a note stating that plans would be kept at their offices for compliance, the back-up in Olympia was considered complete. Biologists were contacted and asked to send in back-up or missing documents so that the audit could proceed. During initial review of HPA applications, 13 of 21 incomplete applications were correctly identified as incomplete. Of these 13, only 10 applicants were sent letters informing them that their applications were incomplete. There was no indication that the remaining 3 applicants were

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notified of a problem with their applications. Thirty-three percent of incomplete applications were not identified as incomplete. Most of these applications were for projects in the freshwater environment. The reasons applications were incomplete included missing State Environmental Policy Act (SEPA) compliance documentation, missing or incomplete plans, or other missing information. Of those correctly identified as incomplete, SEPA compliance was the most common reason, followed by missing or inadequate plans, and finally, missing other key information (Figure 1).

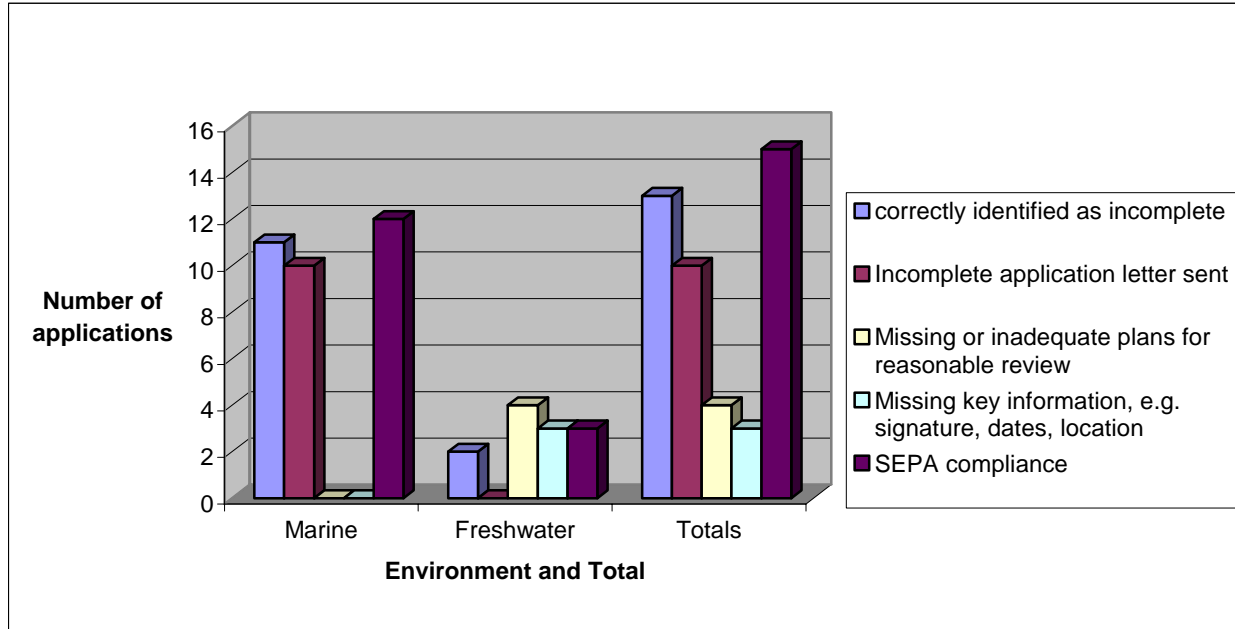


Figure 1. Reasons for incomplete HPA Applications

HPMS Review

There were many errors made when transcribing information from HPA applications into HPMS. Correct SEPA determination was entered less than 40 percent of the time, while other SEPA information such as lead agency was incorrect 15 percent of the time. In some cases, biologists might have known from past experience what the SEPA determination would be by a local jurisdiction on a specific freshwater project type and processed those projects based on this experience. The biologist might not have required the applicant to supply written notification of a SEPA decision despite it being required to have a complete application packet for an HPA. Other errors may have been the result of local jurisdictions changing a threshold determination, and the changed decision was not subsequently entered into HPMS. In some cases, HPA information was present in back-up documents but not in HPMS. Some SEPA information could not be verified because the back-up file was incomplete.

An incorrect RCW or a missing RCW was identified in 12 percent of the HPAs. This error generally was found on HPAs that had multiple projects and in projects that were regulated by different RCWs. For example, single-family residence bulkheads fall under RCW 77.55.141, while a boat moorage falls under RCW 77.55.021. Both of these projects could be approved on the same HPA.

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Missing and incorrect information associated with project location occurred in 18 percent of the HPAs reviewed. This error was the result of incorrect information provided by applicants, keystroke error, and failure to enter information. Project descriptions and agency contact information were incorrect less than 10 percent of the time. Overall, project descriptions entered in HPMS did not match the project descriptions supplied by the applicants 22 percent of the time. It is not a requirement that a project description be entered on an issued HPA, so if an HPA did not have a written description, there was no error. Incorrect HPMS entries for SEPA determination and project descriptions were more common for projects done in freshwater. This might have occurred because projects done in freshwater are more likely to be small and exempt from local permits, and applicants often fail to provide SEPA information along with their application. Additionally, freshwater projects are more likely than marine to have changes in design that are not well documented because biologists often work with individual land owners or small operators that have less experience with permit requirements. Further, biologists frequently do not require changes to plans in writing or written documentation of SEPA in order to expedite issuance of the HPA permit. The correct permit type was entered 90 percent of the time (Figure 2).

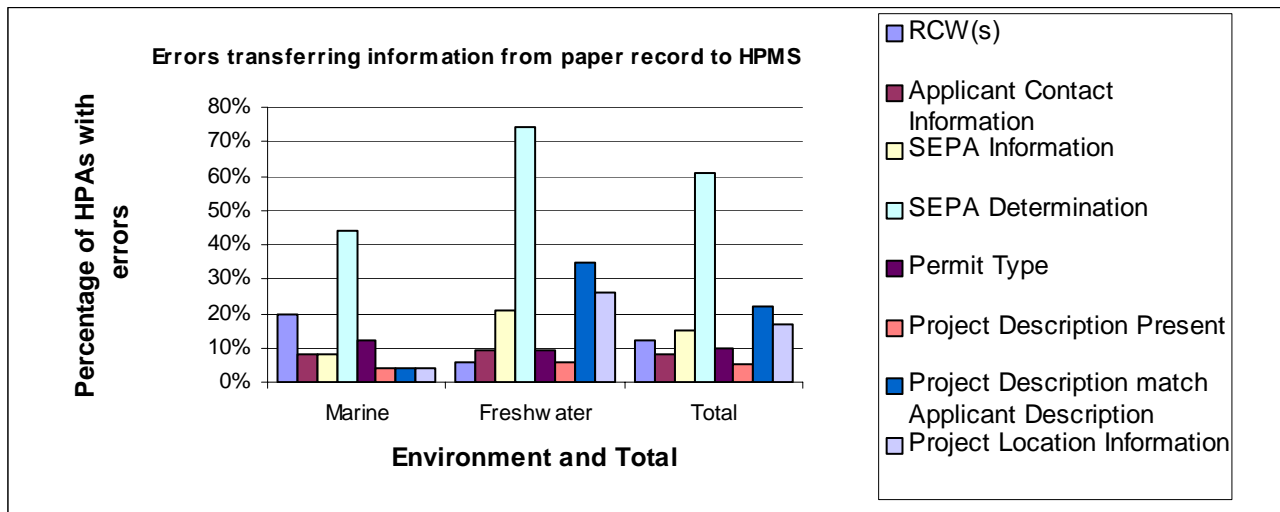


Figure 2. Error rate for transferring information from paper record to HPMS

Issued HPA Review

There are mistakes that can occur in the written provisions of an HPA that can interfere with an applicant’s ability to read, understand, implement, and comply with those provisions. Although these mistakes do not violate any agency regulation, they can have a significant impact on resource protection by causing additional confusion for the applicant. Such mistakes could also interfere with the agency’s ability to successfully enforce the provisions of an HPA and, if necessary, cite an applicant that does not comply with HPA provisions. It may be more difficult to ensure adequate mitigation for impacts and correct violations to protect resources. Of 59 reviewed HPAs, 69 percent had provisions that were appropriate to the project for which they were written, were well organized, were clearly written, and were correctly formatted. Poor organization of the provisions was the most common problem and was found in 16 percent of the

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marine HPAs and in 12 percent of the freshwater HPAs. Poor grammar was found in 8 percent of marine HPAs, while invalid provisions were found in 9 percent of freshwater HPAs. Although the types of invalid provisions were not specifically recorded, they were generally provisions for actions that the applicant was not going to be taking. For example, a provision might have been included in the HPA for pouring concrete although no concrete pour would be conducted in constructing the project. Misspelled words, conflicting provisions, and incomplete provisions accounted for 10 percent of the errors. Many existing WAC provisions were not clearly written or used jargon that was not well defined and required the applicant to do research to be able to understand the provisions.

DISCUSSION

Application Review

Back-up documents for one of every four HPAs issued were inadequate to conduct an audit of the HPA. In discussions with biologists, the following reasons were attributed to this result: 1) some freshwater projects were small, or the project was considered straightforward and the biologist chose not to require plans even though the applicants are technically required to supply plans, 2) forest practices applications are considered a complete application for an HPA by rule, and often applications do not have plans for culvert installation and the biologists do not request them from the applicant, especially if the applicant is a small landowner, 3) notification of SEPA compliance may have been determined verbally and not noted in the record, and 4) records were mailed to Olympia by the biologists but either did not reach the HPA records manager or were subsequently mishandled. Additionally, biologists often keep records in their office and do not notify Olympia that the records will be maintained in the field office until the project is completed. This results in large numbers of records stacking up in field offices. These records may eventually be sent to Olympia in mass. Biologists state that they do not have the time to meet with applicants, negotiate mitigation, and comply with all the administrative requirements. As a result, administrative tasks are partially completed or are not done at all. Once back-up documentation reaches Olympia, it might take clerical staff months to sort records and file them correctly. During the course of this audit, several large boxes of records were brought to Olympia containing back-up for hundreds of HPAs. Some back-up documents are misplaced or misfiled once in Olympia. One record audited in this study contained back-up for three HPAs, two sets of which had been misfiled.

Some plans attached to the HPA permit do not provide the detail necessary to show exactly what work is being proposed. In an attempt to address the shortcoming of the plans, some biologists include specific descriptive provisions about the project in the provisions of the HPA. When poor plans were submitted with the application, however, HPAs permits did not contain enough information in their provisions to fully describe the project.

SEPA documentation was problematic for several reasons. Although WDFW requires written notification of SEPA compliance, many local jurisdictions, acting as SEPA responsible agencies, do not supply a written determination for exempt projects (i.e., those projects that do not meet size or scope requirements for local permits). Some forest practice applications are issued HPAs when the forest practice is exempt from SEPA. When the Department of Natural Resources (DNR) then receives new information on the proposal it may change the class of the permit and require SEPA review. This particular change is usually identified when DNR personnel or others

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contact the biologists to discuss the proposed action. Another error occurs when a Shorelines review is conducted by a local jurisdiction and is accepted by WDFW staff as a SEPA review. Although they are often concurrent, Shorelines review does not fulfill the requirement for SEPA review and the jurisdictions do not report the SEPA decision in these documents.

Missing back-up documentation does not support making informed and accurate decisions on the issuance of the HPA. It is also not in accordance with the WDFW Policy 1020 and can result in the consumption of staff time responding to public records requests.

HPMS Review

There were numerous problems in transcribing information from the paper record to HPMS. SEPA information was entered correctly less than 40 percent of the time. This is a rather high error rate and could bring into question reports generated from HPMS about SEPA compliance. Again, the error rate might be less than reported here because biologists consulted with local jurisdictions verbally but failed to note the information in the written record. Other errors such as listing the wrong lead agency are likely the result of inattention in data entry.

For projects in the marine environment where more than one RCW applied, field staff often missed listing all appropriate RCWs on the HPA. In the freshwater environment, however, identifying the wrong RCW was usually associated with emergency HPAs that were issued as standard HPAs or vice versa. The latter error has fewer ramifications than the former because appeal venues are tied to the RCW under which the HPA is written. If the wrong RCW is cited, then the wrong appeal track would be activated should an appeal be filed. Additionally, there are some requirements that are specific to an RCW that may invalidate provisions of an HPA issued under the incorrect RCW.

Thirty-two freshwater HPAs had project description information from the written application entered into HPMS. Of these 32 projects, 22 descriptions matched what the applicants described on their applications. Project descriptions in HPMS for projects in the marine environment matched those supplied by the applicants 100 percent of the time. Projects in the freshwater environment are more often designed and constructed by landowners or small contractors with little or no experience with HPA requirements. Therefore, projects in the freshwater environment tend to have more informal conferences between the landowners, contractors, and WDFW biologists, and more changes to projects as a result of these conferences. Biologists often assist these applicants and bring in environmental engineers to review the project and provide recommendations for changing designs to better protect resources. On the other hand, there are only a few contractors working in the marine environment, and they generally understand what WDFW expects in plans and project descriptions and that there are few changes to projects during preconstruction conferences. As has been noted, biologists do not do a good job documenting these changes in the written record. In some records with multiple plan sets it is difficult to identify which plan set has been approved.

Several HPAs had either provisions that required identifying a contact within WDFW, Department of Ecology (Ecology), or other agency, but the name and/or contact information for those contacts were missing. Additionally, there were errors made in selecting the correct enforcement contact for a project. Although these are not critical errors, they can cause problems for both the applicants and agency staff attempting to follow a particular project.

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Issued HPA Review

Sixty-nine percent of HPA permits were issued with clear, understandable, and applicable provisions. The remaining 31 percent had readily identifiable problems that could interfere with an applicant's understanding and ability to comply with the provisions of the HPA. Poor grammar and misspelled words make up a small percentage of the errors. Substantive errors make up the majority of errors (Figure 3). In this study, substantive errors are those that interfere with one's understanding of the provisions or interfere with enforcement action.

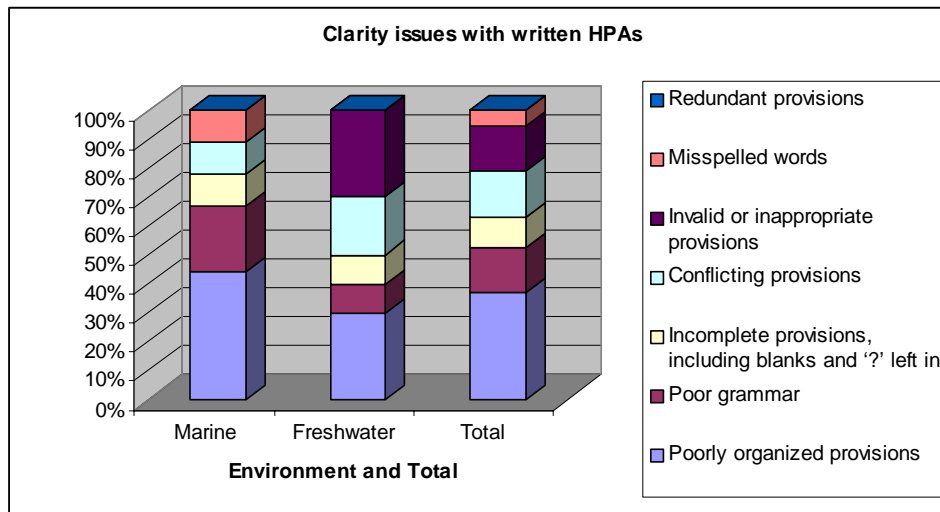


Figure 3 Problem type as percentage of HPAs with problems

Organization of provisions was the most common problem, falling into two categories: 1) identifying which provisions applied under which specific RCW when more than one RCW was listed on the HPA, and 2) related provisions were scattered throughout the body of the HPA provisions section. As discussed previously, RCW citation errors can lead to problems during an appeal, as the appeal may be directed through the incorrect process. The second problem makes HPA permits difficult to read and follow.

Figure 4 contains the provisions from an issued HPA and provides an example of several of the errors and issues that have been noted, from the minor error of improper capitalization to missing data in provisions with required fill-in information. Provisions 13, 14, and 15 address equipment stationing, but are in conflict with each other. Provision 11 requires the installed culvert to have a diameter of 137 feet, which must be a typo, as that is a far greater diameter than would ever be required. Several of these errors would severely handicap the agency if enforcement actions were needed and the applicant chose to be uncooperative.

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1. TIMING LIMITATIONS: The project may begin **Immediately** and shall be completed by September 30, 2005.
2. Work shall be accomplished per plans and specifications approved by the Washington Department of Fish and Wildlife entitled [ADD TEXT HERE] and dated [ADD TEXT HERE], except as modified by this Hydraulic Project Approval. A copy of these plans shall be available on site during construction.
3. The culvert shall be installed and maintained to ensure unimpeded fish passage.
4. The culvert shall be placed on a flat gradient with the bottom of the culvert placed below the level of the streambed a minimum of 20 percent of the culvert diameter for a round culvert, and 20 percent of the culvert's rise for an elliptical culvert. The 20 percent placement below the streambed shall be measured at the culvert outlet.
5. The culvert width at the streambed shall be equal to or greater than the average width of the streambed.
6. The culvert shall be installed to maintain structural integrity to the 100-year peak flow with consideration of the debris likely to be encountered.
7. Fill associated with the culvert installation shall be protected from erosion to the 100-year peak flow.
8. The culvert shall be installed and maintained to avoid inlet scouring and to prevent erosion of stream banks downstream of the project.
9. The culvert facility shall be maintained by the owner(s) per RCW 77.55.060 to ensure continued, unimpeded fish passage. If the structure becomes a hindrance to fish passage, the owner(s) shall be responsible for obtaining an Hydraulic Project Approval and providing prompt repair. Financial responsibility for maintenance and repairs shall be that of the owner(s).
10. The culvert shall be installed in the dry or in isolation from the stream flow by the installation of a bypass flume or culvert, or by pumping the stream flow around the work area.
11. The culvert shall consist of a single barrel. The culvert shall be **137'** in diameter and 87" tall and shall be an arch pipe.
12. Approach material shall be structurally stable and be composed of material that, if eroded into the stream, shall not be detrimental to fish life.
- 13. Equipment used for this project shall operate stationed on the bank.**
- 14. The use of equipment below the ordinary high water line shall be limited to that necessary to gain position for work.**
- 15. Equipment used for this project may operate below the ordinary high water line, provided the drive mechanisms (wheels, tracks, tires, etc.) shall not enter or operate below the ordinary high water line.**
16. Equipment used for this project shall be free of external petroleum-based products while working around the stream. Accumulation of soils or debris shall be removed from the drive mechanisms (wheels, tires, tracks, etc.) and undercarriage of equipment prior to its working around the stream. Equipment shall be checked daily for leaks and any necessary repairs shall be completed prior to commencing work activities along the stream.
17. Equipment crossings of the stream are not authorized by this HPA.

Figure 4. Provisions from an issued HPA showing several common errors

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CONCLUSIONS AND RECOMMENDATIONS

Over the past several years, WDFW has not conducted formal audits of the HPA program. Previous audits were restricted to administrative review of the issued HPA for easily identifiable errors. This is the first audit WDFW has undertaken that covers all three aspects of the HPA program, from administrative procedures through compliance and biological effectiveness of HPA provisions to protect fish and fish habitat, although this paper only addresses the administrative portions of the audit.

This audit has identified some weaknesses in records on HPAs that need corrective action by WDFW. *RCW 40.14 Preservation and Destruction of Public Records* requires all agencies to identify a records manager and to develop records maintenance protocols for all actions taken by the agency. The following definition is used in this RCW: *As used in this chapter, the term "public records" shall include any paper, correspondence, completed form, bound record book, photograph, film, sound recording, map drawing, machine-readable material, compact disc meeting current industry ISO specifications, or other document, regardless of physical form or characteristics, and including such copies thereof, that have been made by or received by any agency of the state of Washington in connection with the transaction of public business.* HPAs certainly meet this definition and the agency has developed a record protocol. However, this audit has demonstrated that regional biologists have not strictly followed HPA recordkeeping protocol and WDFW management has not adequately enforced biologists' adherence to the protocol. Beside the legal issue with incomplete or incorrect records, faulty records make it difficult for WDFW to enforce the Hydraulic Code or to effectively monitor projects to demonstrate either the success or failure of HPAs in protecting fish resources.

Significant in-roads into correcting this deficiency could be made if biologists followed current agency guidelines listed in the HPA manual developed by Regulatory Assistance Section and in administrative guidance memos that have been issued over the past few years. Numerous errors may be avoided if more time was spent reviewing documentation and proofreading HPAs and letters prior to sending them out to applicants. Field staff needs to have regularly scheduled and continually funded training and refresher classes in HPA requirements, as well as in professional development. Staff should have training in grammar. Additionally, Regional Habitat Program Managers and their assistants need to review a subset of HPA records and products on a regular basis, provide support to staff in the form of feedback on their work, and provide training opportunities as necessary to improve performance. When WACs are rewritten, they should be written in plain English and any technical terms should be clearly and adequately defined. This would benefit the applicant and WDFW staff.

Plan specifications for an HPA application should be developed and adhered to. Currently, a plan does not have to contain a great deal of information to be considered complete. This specification should require all the information WDFW needs to evaluate a project's impacts to fish resources. Additionally, proposed compensatory mitigation plans should be required similar to what is generally required by local jurisdictions for wetland and other critical areas impacts, or when none are submitted, documents should support the position that mitigation is not necessary.

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Olympia recordkeeping for HPA back-up should be reviewed for ways to improve record storage and retrieval. The possibility of having a record format for HPA back-up should be investigated. Standardized recordkeeping procedures should be implemented and maintained. Although Habitat Program Administration has provided guidance for work priorities, many employees are currently only working on tasks identified as high priority. Most field offices have no clerical support, so in addition to providing technical assistance, region biologists are expected to manage and provide clerical support for up to three hundred HPA records each year. Therefore, the region biologist's job description needs to be clarified to provide staff the direction to complete all tasks for an HPA permit before moving on to additional work (e.g., technical assistance, SEPA review). This will become even more important if field biologists are expected to conduct compliance inspections on a greater number of HPAs in the future. A review of staffing levels should be undertaken to determine if agency expectations are reasonable given current staffing levels and workload.

The RCWs and WACs relating to Forest Practice Applications and HPA requirements should be reviewed and revisions proposed to require the same level of information for a complete application under Forest Practices as exist in the HPA statute and rules.

HPMS has improved electronic recordkeeping over the previous two database programs used for HPAs. However, as this audit demonstrates, significant problems remain that need to be addressed if HPMS is to fulfill the agencies expectations for the HPA program. The usability of HPMS for generating reports showing trends or identifying concerns with processing requirements is reduced due to the large number of errors generated when entering data into the system. One of the reasons HPMS was developed was to reduce formatting, spelling, and provisions errors, although it has not been completely successful in doing so. However, development of electronic applications and possible links to other agency permit systems could lead to more reliable data collection and management.

HPMS usability issues at the staff level have been a concern; current upgrades and proposed revisions could improve usability significantly. It is a general consensus of Region 6 field staff that it takes longer to write an HPA in HPMS than it did in WordPerfect. Many employees have developed procedures to work around the system and reduce this time. Most have not taken the time, however, to submit provisions packages that they have developed to their supervisors for approval, or to Regulatory Services for review, approval, and inclusion in the HPMS program. Current HPMS modifications may eliminate this problem. Further, many employees do not follow agency direction to enter application information into HPMS when an application is received, only entering information when they write the HPA approval. Entering information when received would help to eliminate errors in data entry of dates and HPA status.

Additional guidance on compensatory mitigation needs to be developed. Review of similar projects seems to indicate that mitigation conditions are not necessarily consistent. However, this is just a preliminary assessment of the paper record. Field verification of projects may shed additional light on this issue.

This audit has revealed numerous problems within the HPA program and administrative processing of HPA applications, but all of the identified problems can be resolved. The Habitat

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Program has made a start with identifying issues under this audit, and now must work on development and implementation of program changes to address these issues.

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Appendix A. Administrative Audit Form

HPA Number _____

Project type _____

Section 1: Application Receipt

1. Type of Application

- Standard.....
- Expedited.....
- Emergency.....
- Fish Enhancement....

2. Back up

- Was backup sent to Olympia Yes No
- Did backup include project plans? Yes No
- Did backup include letters? Yes No None needed
- If not what was missing?

QUESTIONS 3-18 CAN ONLY BE ANSWERED IF BACKUP IS AVAILABLE TO REVIEW

3. Was the application correctly identified as complete Yes No FPA complete
by -----RCW
but -----
maybe missing -----
---needed -----
-----information.

If No what was the reason?

4. If complete, was the date the application received noted on the application Yes No
If yes, did this date match the Accepted Date in HPMS Yes No

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5. If not complete, what was the reason(s) for the application being incomplete:

- Missing or inadequate plans for a reasonable review.....
- Missing key information, e.g. signature, dates, location.....
- SEPA compliance.....
 - Lead Agency missing
 - SEPA decision missing.....
 - Decision date missing
 - Written notice of compliance missing.....

6. If the application was determined to be incomplete, how many days from the received date was this decision made:

7. If the application was identified as incomplete, was this decision correct? Yes No
If not, why not:

8. Was other information missing? Yes No
If yes what was missing?

9. If incomplete, was an incomplete application letter sent Yes No
How many days from the received date was this decision made:
Was an entry into HPMS made Yes No

10. Was the application made complete Yes No
Was this date noted on the application Yes No
Did this date match the Accepted Date in HPMS Yes No
Was the Accepted Date correct (i.e. the date the issue making the application incomplete was resolved) Yes No

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Section 2: Application Review

11. Was the application placed on hold? Yes No

12. If it was placed on hold, how many days from the Accepted Date was this decision made?

If so what was the reason?

Applicant not available for a site review.....

Site not accessible.....

Applicant requested hold.....

Was the reason valid? Yes No

If not, what was the problem?

Was the reason for the hold addressed? Yes No

If yes, was the date the application was taken off hold correct (i.e. the date the issue for the hold was addressed)? Yes No

How many days occurred between the date the issue was addressed and the application taken off hold:

13. Was the correct RCW(s) cited for the application type? Yes No

14. Were applicant and agency contact information entered correctly? Yes No

15. Was SEPA information complete, correct? Yes No

Determination Yes No

Decision Date Yes No

16. Was correct Permit Type entered? Yes No

17. Was there a project description? Yes No

Did it match the project as described by the applicant? Yes No

18. Were project locations listed, complete and correct? Yes No

If not correct what were the reasons?

Incorrect water body name

Incorrect County

Incorrect Latitude or Longitude

Incorrect Sec/Town/Range

Other?

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Section 3: Issued HPA

19. Were the provisions clear, understandable and formatted correctly? Yes No

If not what were the problems?

- | | | |
|--|-------|--------------------------|
| Poor grammar | | <input type="checkbox"/> |
| Misspelled words | | <input type="checkbox"/> |
| Redundant provisions | | <input type="checkbox"/> |
| Conflicting provisions | | <input type="checkbox"/> |
| Poorly organized provisions | | <input type="checkbox"/> |
| Invalid or inappropriate provisions | | <input type="checkbox"/> |
| Incomplete provisions, including blanks and '?' left in..... | | <input type="checkbox"/> |
| Other errors? | | |

20. Was contact information for WDFW staff entered in provisions if required? Yes No
[This would be to report water quality problems or fish kills]

21. Was contact information for other agencies entered correctly if required? Yes No