

Woody Biomass Harvesting Guidelines Implementation Plan Development Report to the Wisconsin Council on Forestry

Background and status

During the past year, the Wisconsin Council on Forestry and the WDNR Division of Forestry have been engaged in a process to develop guidelines for the harvest of woody biomass from Wisconsin's forestlands. The guidelines were drafted at the request of the Wisconsin Council on Forestry by a technical team comprised of WDNR staff using best available information. Draft guidelines underwent technical review by a select group of experts, and a stakeholder review by an Advisory Committee selected by the Wisconsin Council on Forestry. After review and approval by the Advisory Committee, the guidelines were presented to the Wisconsin Council on Forestry at their September meeting. The Council elected to solicit public input prior to final approval. Following a public comment period, the Advisory Committee revised the guidelines in light of the comments received and approved them for presentation to the Council on Forestry at their December 16, 2008 meeting.

At their December 16, 2008 meeting, the Wisconsin Council on Forestry approved the fifth draft of Wisconsin's Forestland Woody Biomass Harvesting Guidelines (BHGs) pending results of DNR consultation with tribal partners. In addition, the Council requested that the WDNR – Division of Forestry work with partners to develop an implementation framework to be presented to the Council at their March 2009 meeting. Division of Forestry staff developed an implementation framework that included: an explanation of guideline flexibility, a calendar for guideline implementation on state, county, and MFL lands, and discussion papers for six implementation elements: Research, Site differentiation, Training, Field Implementation, Monitoring, and Updating/Information Management. Each element outlined options for implementation based on needed and available resources. The implementation plan was distributed to stakeholders for a written comment period which included a listening session held February 10th at the Forest Products Laboratory in Madison, attended by 26 people.

Eleven sets of written comments and input from tribal partners were collected during the implementation plan comment period. Comments were categorized by theme and implementation element. Many comments were divergent or contradictory, but where possible, adjustments were made to the implementation plan to reflect comments received. A summary of these changes are included in this report. The full-text of comments received, a spreadsheet summary of comments by theme and a detailed discussion of recommended options for each implementation element are included in the attached "BHG Implementation Plan Attachments" document.

Certification and Biomass Harvesting Guidelines

During 2007 certification audits of Wisconsin's State and County Forests, DNR was required to develop biomass residual standards for public land timber harvests. The Corrective Action Request (CAR) prescribed a two-year process to develop guidelines for retention of coarse woody debris, allowing time for public input. During 2008 certification reviews, DNR pointed to the collaborative effort initiated by the Wisconsin Council on Forestry. The audit report applauded the broad stakeholder effort but cautioned that adoption of biomass residual guidelines for DNR and County Forest lands are mandatory even if the Council process were to fail. A Department directive would be expected to apply the draft standards (or other alternative) to public lands in time for the 2009 audits. Other certified landowners in the state will be facing similar requirements to retain certification next year.

Tribal Consultation

At the December 2008 Council on Forestry Meeting, the Council concurred with the recommendation of the Division of Forestry to engage in consultation with tribal partners regarding the BHGs and the draft implementation plan. Feedback from tribes was solicited by the Department. A letter was sent to the tribal chair or president outlining the ways to be involved in the process, including participating in the meeting on February 10, 2009, contacting staff, or providing written comments to the Division. In addition, the Division's eight tribal liaisons engaged in staff-to-staff contact outlining the same opportunities as above in addition to taking comments directly.

These efforts resulted in comments from seven of the eleven tribes and a representative of the Great Lakes Indian Fish and Wildlife Commission. The general themes that emerged while evaluating the comments involved monitoring protocol, keeping guidelines voluntary, ensuring information is science based, overall long-term impacts if too much material is taken and specifically the concern of the retention target of 10% versus 30%. Based on Department review of their comments, we are moving forward with the guidelines as presented to the Council in December of 2008. As the Division looks forward, continued tribal consultation within this topic area would further the dialogue around the utilization of science based information, applicable research and the appropriate level of retention.

Implementation Element Summaries

RESEARCH

The Biomass Harvesting Guideline Advisory Committee recommendations for research included research on the impact of biomass removal on soils, water, biodiversity, nutrient cycling, forest productivity and sustainability, wildlife, etc. The top priorities identified are the impacts of fine woody debris on ecosystem sustainability and the role of fine woody debris on dry nutrient-poor sandy soils. Comments received were varied and placed into 5 categories: additional research needs, timeline to achieve results, research focus, research process, and research funding.

The recommended option is to reallocate \$110,000 of research funding within DNR's Science Services Program to address the highest priority research need; the role of fine woody debris on dry nutrient-poor sandy soils. This would be initiated immediately so initial results could be available by 2011-2012. Additional resources and collaboration would be required to address the long list of research questions developed by the BHG committee.

SITE DIFFERENTIATION

Guidelines 3.B, 4.B, and 5.B refer to sensitive sites (dry nutrient-poor sandy soils, shallow soils, and dysic Histosols) where harvest of FWM is limited, primarily due to concerns about potential nutrient depletion and loss of site productivity. Options for assisting users who may have difficulty determining whether their site is considered sensitive under the BHGs are: 1) develop information based on Forest Habitat Type Groups as a "first cut" to identify sites that could be dry nutrient-poor sands; 2) produce a list of soil survey map units, by county, that are on sensitive sites; 3) develop an online tool in Web Soil Survey; and, 4) provide on-site consultations in special cases. Comments from constituents were primarily about the lack of resources for on-site consultations. No new options were developed based on the comments received.

Recommended options for addressing site differentiation needs are to proceed with developing the Forest Habitat Type Groups tool and the list of soil survey map units by county. These actions can be accomplished by reallocating resources within DNR. The DNR has very few resources for on-site consultations, thus only a limited number of on-site consultations can be conducted by DNR staff, on a case-by-case basis. However, through partners participating and contributing resources the availability of on-site consultations could be increased.

TRAINING

Training needs have been identified as: 1) an overview and introduction to the BHGs, 2) how to determine site sensitivity that may restrict harvest of FWM, and 3) how to measure down woody material in the field. Groups to be trained are State and County Forest staff, DNR private foresters, cooperating consultant foresters, tribal natural resources staff, and loggers. Options identified included those where DNR staff would provide most or all of the training, and those where partners would participate by contributing staff or resources. Comments from constituents indicated that there were concerns about the lack of resources to conduct training, and because of the lack of resources, the length of time it would take to train all the affected users. No new options were developed based on the comments received; however, some additional user groups were identified.

Current options for providing training are limited by a lack of resources. An introduction to BHGs could be provided by DNR staff to State and County forests in 2009, and the BHG introduction along with site differentiation guidance could be given to about 150 people in 2010 and each year beyond. Field measurement training would be added in 2011, if field methods are finalized. DNR will continue to seek partnerships with the forestry community to provide additional training opportunities so that all training needs can be met by 2011.

FIELD IMPLEMENTATION

Implementation of BHGs will have an effect on field operations. The implementation calendar proposes a timeline for phasing in BHG field implementation in steps as tools and systems are developed. The timeline options initially proposed were revised based on comments received; these comments indicated that some implementation steps did not have enough lead time. Other comments concerned the lack of resources within DNR to develop the needed tools, and suggested that tools and training should be complete before BHG implementation.

Because of certification requirements, implementation must be phased in on certified lands as soon as implementation tools and systems can be developed. Recommended options are to implement the BHGs in steps as tools are made available. The calendar, in summary, calls for implementation as follows:

- DNR-managed State-owned lands: New timber sales sold starting in the spring 2010.
- County Forest lands: New timber sales sold starting in the spring 2010.
- Private Managed Forest Law (MFL): New Cutting Notice approval beginning on January 1, 2011.
- Private Forests (not under tax law): Guidelines are available for all landowners and can be used at their discretion.

Opportunities for sales that include harvest of FWM would be developed and/or approved based on management objectives and screening for BHGs. The normal process of timber sale administration includes checking the site to determine if the management prescription is being implemented; harvest of FWM would be part of a prescription, and checking it would be incorporated into the process of sale administration. As field monitoring tools are developed, and training is provided to public foresters, loggers, and others, then these tools will also be used to administer timber sales.

MONITORING

Six options were presented for monitoring the BHGs. The options range from very easy and cost effective (timber sale checklist) to the very complex and costly (collecting data on fine woody debris during the Wisconsin State Forest Continuous Forest Inventory (CFI)). From the comments received, concerns were expressed about the costs of monitoring and delays in implementation. Recommendations included monitoring across landowner categories and to build on the success of the BMPs for water quality

monitoring efforts. There was also recognition of the value of monitoring for both certification efforts and for evaluating the guidelines.

As a result of these comments, we recommend:

- Developing a biomass harvesting checklist to integrate into existing forms for state, county and MFL timber sales with completion expected by January 2010.
- Investigating with partners the development of an integrated monitoring system for the five major landowner categories – federal, state, county, industrial and non-industrial private with evaluation completed by January 2012.
- Determining the feasibility of collecting data on fine woody debris as part of the Wisconsin State Forest CFI by January 2012.

The first recommendation will allow for the collection of baseline data on BHGs and FWM harvests starting in 2010, addressing concerns about timeliness of information and providing information for the three-year review of the BHGs. The remaining recommendations will require more time to investigate; however, if programs are developed, they would be ready to implement following the three-year review of the BHGs. All of the recommended options should provide valuable data, if implemented, for certification and guideline evaluation.

UPDATING AND INFORMATION MANAGEMENT

The recommendation for this element was to develop a BHGs field manual, review the BHGs after three years, and evaluate the BHGs for inclusion in the Forest Management Guidelines. Comments that were submitted expressed concerns about:

- the need for field manual before the three-year review period
- the ability to modify the guidelines as new information becomes available
- balancing the need for guidelines, public policy and the precautionary principle

As a result of these comments, we recommend developing a field manual for the BHGs to help facilitate the dissemination of the BHGs and training efforts. Reviewing the BHGs in three years or sooner if new monitoring or research data is available. Evaluation of whether it is appropriate to include the BHGs in the Forest Management Guidelines should continue.

Looking ahead

Many of the comments received on the implementation elements highlighted the lack of WDNR resources available to implement many of the options discussed. While it is true that many of the options would require either a significant reallocation of existing resources or new resources to become a reality, many of the implementation options could be accomplished with the help of partners. The Division of Forestry hopes to engage the resources of the entire forestry community in the implementation of the Forestland Woody Biomass Harvesting Guidelines. This includes collaboration on training, development of field implementation tools, research, monitoring, and information management. As we look to the future, we expect that the implementation options will broaden, and that additional information gathered through research and monitoring will improve the Guidelines over time.