

# **BHG Implementation Plan – Comments**

## **List of Documents**

Summary of Comments Received

List of Individuals Submitting Comments

List of Individuals Attending Listening Session

Full Text of Written Comments

Discussion of BHGs and State's Certification Responsibilities

Line #	Submitted by	Affiliation	Comment
	<b>Tribe Name</b>	<b>Tribal Input</b>	<b>Appears shaded</b>
	<b>Jonathon Gilbert</b>	<b>GLIFWC</b>	<b>Appears shaded</b>
<b>Guideline Implementation and Flexibility</b>			
1	Jere Hamel	Futurewood Corp	These guidelines will not be voluntary, they will become the standard. Much like the BMP's are supposedly voluntary, there is a certain standard of how we conduct our business and we must all adhere to it at a level above or equal to the standard established. Thus not making the BHG voluntary. All of the lands we manage regardless of ownership (private vs. public), (MFL vs. Non-MFL) all require the same level of performance. By this I mean that regardless of ownership we have agreed to adhere to certain guidelines we must follow, we can not prescribe something on a particular land just because of the ownership. Any entity that is certified (SFI, FSC) will have to strictly follow these mandatory guidelines and will have to verify through audit procedures, documentation, etc. they are in compliance. This means there will be a substantial additional cost in time, resource allocation, and dollars at a time when many in our forest products industry are severely struggling to survive.
2	Jere Hamel	Futurewood Corp	With the biomass harvesting industry being so new the evolving change will occur very quickly. Many consumers of biomass will require different feedstock's in relation to the end product they are producing. Thus, we will see different levels of biomass being removed from each site. We have already seen this with the few biomass consumers already. With that said, all biomass harvesting is grouped into the same category, regardless if you use the whole tree (limbs, branches) or maybe only down to a 2" top (bole, stem).
3	Jere Hamel	Futurewood Corp	You reference "Experimental Techniques" that can be used to increase our knowledge based on management practice objectives. Who determines these "Experimental Techniques" and who will supervise? I would suggest that someone who is only removing material to a 2" top diameter should be classified in this "Experimental Techniques". I don't see how you can implement something if your not sure of the results yourself.
4	Jere Hamel	Futurewood Corp	You have stated that further research is needed to be collected on sites with low quality soils (dry nutrient-poor sandy soils). Funding will become available July 1, 2009 and will last for 2 years, possibly 3 years. Can we realistically expect to see the results in the soil productivity in such a short time period? Also, you have stated that it takes 14 + years to make a change in the Silvicultural Handbook, we can not wait that long in this new emerging industry. <b>Keep in mind the initiative set forth by our governor.</b>
5	Nancy Bozek	WVOA	Recently, WVOA has become aware that WI DNR is instructing MFL landowners harvesting woody biomass to use the yield tax tables for fuelwood. Based on current biomass prices, this will result in MFL landowners paying 50% or more tax on these products. We feel the fuelwood rates do not accurately portray the current woody biomass markets. Current yield tax rates are determined by using regional sales information along with the parameters of cords, board feet or cubic feet of material. Fuelwood markets tend to be hardwood species sold in cords. However, when it comes to biomass, the parameter will be in tons and more softwoods or mixing of species may occur resulting in variable weights from region to region. In addition, biomass harvesting is being conducted in two different manners on the land, for some timber sales biomass is the primary product and on others it is supplementing normal harvesting operations by utilizing nonmerchantable residual material on the site.
6	Earl Gustafson	WI Paper Council	The implementation plan appears to be well thought out and developed. It is evident that it is the product of individuals who are committed to the opportunities biomass harvesting represents and who are equally committed to assuring that the diverse concerns raised during the creation of the BHG are addressed in the document and implementation plan.
7	Earl Gustafson	WI Paper Council	Creation of the BHG was, and will continue to be, a public policy balancing act. Wisconsin is a leader in sustainable forestry - particularly in achieving compliance with several rigorous, third party certification programs - and our collective concern with the environment was clear throughout the process. Appropriately so. At the Same time, the guidelines - although nominally voluntary - will be a compliance reality for land owners and managers, industries dependent on wood and biomass, and timber producers. As such, it would be counter-productive to Wisconsin's interest in the development of renewable energy if the guidelines were to preclude or materially suppress sustainable biomass harvesting by being unnecessarily rigid or by imposing unaffordable costs on participants anywhere in the chain from forest to end-users.

Line #	Submitted by	Affiliation	Comment
8	Earl Gustafson	WI Paper Council	The DNR needs to continue the exemplary sensitivity - employing listening, analytical and compromising skills - it has shown throughout this process as an implementation plan is rolled out and the on-the-ground reality of the BHG becomes known.
9	Jane Severt	WCFA	Implementation and acceptance of the guidelines will be most difficult in areas identified with poor nutrient and shallow soils
10	Jane Severt	WCFA	Economics will most certainly play a role in the acceptance level of guideline implementation though forest sustainability should be the primary focus
11	Lynn Wilson	Plum Creek	Although the guidelines are presented as voluntary, documentation is required to deviate from them; a written justification for not following guidelines is counter to the voluntary intent. Our concern is the guideline implication on biomass harvests on lands enrolled under the Managed Forest Law where harvests must be authorized by the WDNR. A harvest plan that does not meet the <u>voluntary</u> biomass guidelines is too open to interpretation by the regulator reviewing and ultimately signing off on the harvest plan. It will be important to private landowners choosing to enter the biomass market to understand and expect that these guidelines are voluntary.
	Henry Schienebeck	GLTPA	At the Governors Council on Forestry meeting in December when the guidelines were approved, it appeared to us that it was the councils intention to keep the guidelines voluntary until three years of data had been collected. Based on the conversation before approving the guidelines, it was also our understanding that the collection of data is necessary to help develop methods to measure fine woody debris i.e. visual reference, transects, ect, and assess the effectiveness of measurement tools
	Henry Schienebeck	GLTPA	It also appears to us that there is much disagreement and or confusion about the status of borderline dry nutrient-poor sandy soil sites. With that in mind it would be imperative that the guidelines remain voluntary until the data is collected and agreed to by all parties, so that the guidelines can meet the requirements of sound forestry practices. Given the state of the budget and the amount of time required to collect the data we would question whether or not 3 years is even enough to keep the guidelines voluntary.
	Henry Schienebeck	GLTPA	It is our opinion that guidelines are only voluntary as long as loggers, landowners, foresters and government agencies are working together as a group, striving to achieve sustainable forests for multiple reasons.
12	Ho Chunk	Tribal Input	Are guidelines enforceable - need to be voluntary.
13	Menominee	Tribal Input	Even before implementation of the BHG's and utilization of 4" down to 2" diameter class materials this would most likely need to be addressed in our FMP and associated NEPA document. I guess it depends on how much would be removed and where it was being removed from. A monitoring protocol would probably be vital to the tribe obtaining approval for harvesting this forest product. Menominee would most likely need to look at existing BIA policies or regulations and whether we might conflict with any that are applicable to Menominee. Other tribes might have differing issues in this regard. I don't know how that relates to a state perspective though. Contracting language would probably also be a crucial element to this effort.
<b>Implementation Calendar</b>			
14	Mike Luedeke	WDNR	Timber sale contract enforcement in 2009? How can this start in 2009 without training, without contract language, without logger education.....? We are already in February 2009.
15	Jeanne M. Higgins	Forest Service	The Chequamegon-Nicolet NF is supportive and in agreement with the overall implementation plan proposed over a three-year period on state, county and Managed Forest Law lands. We do not have any specific recommendations for changing the plan or selecting options at this time. The completed implementation plan will also be helpful to us when considering the application of the Biomass Harvesting Guidelines on the national forest.
16	Jere Hamel	Futurewood Corp	With all different types of ownerships, there is no reason why we can not begin to train, implement, monitor and research on all entities of ownership. I'm lead to believe that you could probably get faster results from private sales vs. waiting for public sales to become available. A vast majority of public sales will be sold to contractors who at this time do not harvest biomass.
17	Jere Hamel	Futurewood Corp	You are suggesting no changes to the MFL until 2010, a vast majority of training, implementation; monitoring and research could be done on these properties immediately. Private owners are some of the best stewards of the land available, yet, we are waiting until last to implement biomass guidelines to them.

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18	Lynn Wilson	Plum Creek	During the Governor's Council meeting in December, Rep. Hubler made a motion and a discussion ensued on voluntary vs. mandatory guidelines. To address MFL requirements, Forest Management Guidelines (FMG's), and the Silviculture Handbooks, I expected a "phased in" approach. In the Implementation Timetable, " <b>active enforcement, compliance, screening against guidelines</b> " are indicated in 2010 and 2011 prior to the initial research being completed and more advanced site differentiation tools would be available.
19	Lynn Wilson	Plum Creek	Is the DNR proposing on State Land (2009) and County Land (2010) stumpage sales planning to harvest FWM be " <b>screened</b> " and biomass removal not allowed? My understanding was that this is a 3-year implementation process.
	Henry Schienebeck	GLTPA	In the guideline implementation plan, enforcement is already mentioned by the year 2010 yet there is no mention of logger training until 2011. Wouldn't you agree that it would more beneficial for loggers to receive training during the "voluntary" period, along with foresters and others, to have a smoother transition into actual implementation of the guidelines? Wouldn't you also agree that moving slower but more efficiently with <b>all</b> the stakeholders would actually be faster in the long term?
20	Ho Chunk	Tribal Input	Implementation Plan talks about all lands - what does "all" mean (referenced table on Monitoring summary table)
<b>Research</b>			
21	Jan C. Harms	UWSP - College of Natural Resources	In order to have sound biological information about Biomass Harvesting impacts, I am convinced that one must research and track multi-rotational harvests under a variety of harvest intensities. While researchers have toyed with these questions for more than 30 years, I do not believe we have the needed results, primarily due to the detail needed and the difficulty and cost of multi-rotational studies.
22	Dave Hoppe	Forest Service	I would suggest that the research, especially on nutrient-poor soils, move forward as soon as possible, due to the potential long-term nature of such studies.
23	Mike Luedeke	WDNR	Research needs. Field input into the research needs is needed. I believe additional work is necessary to determine the top priority for research. Could additional effort be invested in screening for already completed research.
24	Jere Hamel	Futurewood Corp	Any amount of research collected from 2009 -2012 is going to generate equal to or more research from the original. Thus creating a long timetable for evidence. One example of this would be the retention of 2 inch and smaller FWM vs. whole tree and the impact on low quality soils.
25	Jere Hamel	Futurewood Corp	You state funding will become available July 1, 2009 do you have a plan in place and ready to implement. Is this research funding going towards the areas of greatest need and the development of further biomass harvesting, or is it feeding a wish list that will benefit only the researchers?
26	Jere Hamel	Futurewood Corp	Why would we need to create computer simulations to obtain the <b>desired</b> results? This research that is going to be collected is going to give us the actual results not the desired results we have already formulated without proper research.
27	Nancy Bozek	WVOA	WVOA is requesting that another area of the woody biomass issue be studied – creation of yield tax figures under the Managed Forest Law (MFL) program. There is very little data on prices, weights, conversion factors and species types as it relates to biomass harvesting. Dues to these factors, WVOA is requesting a 5-year moratorium be placed on charging yield tax for woody biomass harvested. This time period will allow for the collection of meaningful timber sale data to establish regional biomass rates for the yield tax tables.
28	Nancy Bozek	WVOA	The need to create MFL yield tax information for woody biomass harvesting based on actual timber sale data is necessary and should be developed over a period of years. WVOA supports a 5-year moratorium on charging yield tax for woody biomass harvested while the data is being collected.
29	Jane Severt	WCFA	Research needs in the area of biomass harvesting are huge. Due to the immediacy of the need, it appears that research in the area of biomass harvesting and its effects on forest sustainability should be a priority in Wisconsin. The demand for renewable sources of alternative fuels will most likely continue to grow and reoccur in the future. The sudden interest in woody biomass as a source for an alternative fuel source has set the stage for the identification of our shortfalls regarding adequate research in this area. If we would have been conducting more research or doing better monitoring on whole tree harvest operations in our state over the past 20-30 years perhaps we would have better data for making decisions regarding biomass harvesting today. Hindsight may be 20/20 but we should count this as a lesson learned and begin the research that will take decades to complete but hopefully will in the long run provide the answers we need for future decisions.

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30	Jane Severt	WCFA	Many important research needs have been identified during the development of the guidelines. The topics identified under the category of soil nutrients appear to be a high priority.
31	Jane Severt	WCFA	The lack of research in Wisconsin regarding the removal of fine woody material from forests is an additional reason why the guidelines need to be periodically reviewed before they become incorporated into any document that outlines specific acceptable practices in any forest management manual.
32	Jane Severt	WCFA	Realistically, we are not going to learn what we need to know about forest sustainability related to biomass harvesting in a period of three years.
33	Jane Severt	WCFA	We recognize that financial resources necessary to conduct research will be challenging to obtain. Wisconsin's entire forestry community must work together to address the identified needs.
34	Lynn Wilson	Plum Creek	The Research RFP process and should have stakeholder oversight. I have followed up with the UW-Madison College of Life Sciences and Agriculture and they support this approach. Including wood consuming facilities, loggers, landowners, and academic expertise provides increased collaboration and leverage the best available science
35	Lynn Wilson	Plum Creek	As discussed on February 10 <sup>th</sup> , the research proposals are too short-term and site specific to address the broad question of nutrient depletion. 2-3 years is too short-term to provide information on site nutrient rebuild and quantify actual depletion if any. The studies need to have some test of indicator of nutrient depletion, e.g. foliar concentrations, tree growth. Soil amendments should be tested for effectiveness of replacing nutrients removed. The use of fertilizers and wood ash should be considered as means to address any potential depletion problem identified. Sustainable agriculture practices using fertilization and other amendments have a long history in Wisconsin. And there is considerable science available for forest fertilization.
36	Lynn Wilson	Plum Creek	Indicators of nutrient depletion (e.g. foliar concentrations) or tree growth effects on soils considered too nutrient poor to support biomass removals should be used rather than avoiding harvests on these soils.
37	Jonathon Gilbert	GLIFWC	I would urge that a question surrounding the quantities of fine woody debris retained in biomass harvested stands and the impacts on the forest ecosystem be developed and included in the research portion of the implementation plan.
38	Jonathon Gilbert	GLIFWC	This is also a critical component of the implementation efforts. I have already mentioned a couple of new research efforts that should be undertaken (i.e., retention guidelines, field measurement tools). Why the subject of this initial research project was chosen is a bit unclear. This research would evaluate the effects of biomass harvesting on forests that are not open to such harvests under the current guidelines. It appears that the reason for this research is to demonstrate that biomass harvesting has no or little effects on this habitat type thus the restriction is unnecessary. This is not how science works (proving a negative). There are many much more relevant research topics that should be developed. This one is unneeded.
39	Lac du Flambeau	Tribal Input	What does the science indicate- How much is enough to leave? How much can you take? These are big questions which remain.
40	Ho Chunk	Tribal Input	Need to be science based but again not sure of long term impacts
<b>Site Differentiation</b>			
41	Mike Luedeke	WDNR	Site differentiation tools. Habitat classification provides only a small part of this solution especially since most of the TSE work is done in fall, winter, and spring without use of indicator species. And the NRCS soil maps provide such a broad range of soil characteristics on specific site, that I'm not convinced this provides a ready to use tool yet. I think the development of such site differentiation tools will involve much more ground truthing that has been anticipated and will not be ready for the summer season.
42	Jere Hamel	Futurewood Corp	The option of using the existing resources within the WDNR is fine, our first step should be allocating funds to the research based on concerns of potential nutrient depletion, based upon harvesting techniques (2" vs. whole tree).
43	Jane Severt	WCFA	Using habitat type groups as a first check in determining whether sites are on dry nutrient-poor sands is a good idea. Habitat typing is a tool familiar to foresters. Much work has already been done in Wisconsin relative to the correlation of habitat types and soil types. The data housed by Pri-Ru-Ta RC&D should be considered for use in addressing this option. Please consider all available resources, especially those offered by other agencies to avoid duplicative efforts in this area.
44	Jane Severt	WCFA	In the area of on-site consultations; consider all possibilities not just existing WDNR staff
45	Lynn Wilson	Plum Creek	The Site Differentiation Tool to determine sensitive sites is an extensive undertaking. If a <b>"disagreement or confusion about the status of a borderline dry nutrient-poor sandy site"</b> occurs, will the DNR and other resources be available to be the "on-site consultants" reference in the draft documents.

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46	Jonathon Gilbert	GLIFWC	On forested lands where management plans are required, sites available to biomass harvest under the guidelines should be identified. This should be one effort in master planning. Identifying sites on a project by project basis does not allow for evaluation of cumulative effects.
<b>Training</b>			
47	Jere Hamel	Futurewood Corp	With so much being unknown about soil depletion and field measurement protocols how can we train people if we are not sure ourselves
48	Jere Hamel	Futurewood Corp	Time is of the essence. We don't have a number of years to train everyone.
49	Jere Hamel	Futurewood Corp	We can not effectively setup sales and administer sales until people are trained? With the implementation timetable that has been presented already we are looking at training DNR staff sometime in 2009 and you have proposed implementing FWM in the fall 2009 bid opening. Is it feasible that we can train DNR staff in a period of approximately 6 months, or are we just not going to allow FWM to be harvested until training has occurred? I would be lead to believe that it would be near impossible to get staff trained within the next 6 months, which will only prolong the process of being able to harvest FWM.
50	Jere Hamel	Futurewood Corp	An on-line presentation would greatly expand the number of constituents. Plus, many would be able to take the training at their convenience.
51	Jere Hamel	Futurewood Corp	Many loggers would benefit if the training was incorporated into the FISTA classes offered. Many of the current FISTA classes are repetitive for many, so I'm sure any new material being offered would create interest.
52	Jere Hamel	Futurewood Corp	Can we honestly administer and enforce any of the guidelines until proper training is completed.
53	Jane Severt	WCFA	This will be an extremely important aspect of the implementation. Consider the utilization of outside agencies to assist in the training.
54	Jane Severt	WCFA	Tools for practitioners to use in the implementation of the guidelines will be more valuable than power point presentations that simply outline the guidelines.
55	Jane Severt	WCFA	County foresters also need to be involved in the training, not just WDNR foresters, cooperating consulting foresters and loggers.
56	Lynn Wilson	Plum Creek	Training is a key to implementation – and has a proven track record in the evolution of the Water Quality BMP's – more effective than monitoring and regulation. How will this training be paid for and in what forum do you expect to deliver the training? DNR workshops, FISTA module, Logging Congress? Considering the current financial position the State of Wisconsin and the forest industry, I'm concerned that there won't be adequate resources for this important component.
57	Jonathon Gilbert	GLIFWC	Training opportunities should be afforded to tribal natural resources staff and forestry operations. In addition, Bureau of Indian Affairs foresters may be in need of training as well.

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<b>Field Implementation</b>			
58	Mike Luedeke	WDNR	The start of biomass implementation on state owned lands for this coming fall is not realistic. Many of the state sales to be offered for bid this fall have already be established or are currently being established right now. Tying the implementation to bids is 6-12 months too late. The field and office work by foresters is completed many months in advance of the bids. The BHG guidelines have not been rolled out nor has the associated training been offered to field foresters. Sales have already been designed, volumes estimated, data entry completed, and approvals made for such sales. Field folks have been working hard on TSE and asking them to redo sale designs, narratives, volume estimates, and prospectuses is very inefficient. More lead time is needed than what is proposed.
59	Mike Luedeke	WDNR	The implementation has to provide sufficient lead time for training and technical issues to be incorporated into the sale design. I recommend that the implementation on state lands at minimum parallel the timeframe proposed for county forests. The BHG manuals or technical guides are not available ye to instruct field staff on the parameters of BHG as they apply to state lands.
60	Jere Hamel	Futurewood Corp	The field implementations of BHGs are not specific to forest ownership(s). With the certification of SFI and FSC we need to apply the guidelines to all ownerships.
61	Jere Hamel	Futurewood Corp	You reference "the need to develop actual field implementation tools which can be used by foresters, loggers and landowners to measure if the BHGs are being applied according to the specific site prescription", without this how can we implement the BHGs even on an elementary scale.
62	Jere Hamel	Futurewood Corp	Some agencies at this time are very reluctant even to consider biomass harvesting due to financial considerations. One the first steps we need to take is that if harvesting biomass will not adversely effect the management goals that it must be allowed to occur. Quite often goals and objectives are misconstrued, and personal agendas override management goals. To meet our goals and energy initiatives (reducing our dependence on fossil fuels at stated by Governor Doyle) biomass utilization must be able to be done cost effectively, efficiently, and without proving to be so overly burdensome as it will become if these guidelines are implemented. Woody biomass is a renewable resource which, if utilized, will provide a huge economic boost to our industry and Wisconsin's economic well being. Personal agendas can not come into play.
63	Jane Severt	WCFA	Field implementation on county forest lands should coincide with the implementation on state lands. This will be more acceptable to forest certification auditors.
64	Lynn Wilson	Plum Creek	Field implementation refers to " <b>develop methods to measure fine woody debris i.e. visual reference, transects, etc</b> " in 2009. How will this be accomplished with current DNR staffing, budgets, and priorities? Followed by " <b>assess effectiveness of measurement tools...</b> " in 2010? Considering the current financial position the State of Wisconsin and the forest industry, I'm concerned that there won't be adequate attention to this step.
65	Jonathon Gilbert	GLIFWC	This element dove-tails with the monitoring element in that methods must be developed to measure the quantities of fine woody debris left behind. I recommend that option 2 be selected that calls for research to develop and field test measurement tools.
<b>Monitoring Systems</b>			
66	Jere Hamel	Futurewood Corp	How can we monitor sites if we don't have all the tools in place now?
67	Jere Hamel	Futurewood Corp	Cost is an ongoing concern that you have on all aspects and rightfully so, are we trying to gather to much information on a limited budget. Is this constraint going to limit the feasibility and "common sense approach" to gathering the required information? The industry cannot incur anymore cost into supporting this collection and monitoring system.
68	Jere Hamel	Futurewood Corp	If we cannot get the monitoring and collection system up and running before 2012 we will have discouraged many businesses from coming to our state. Yet, at the same time we are going to discourage businesses from coming because we don't have the information to make an intelligent decision, thus making guidelines (laws), on speculation without supporting documentation. Not only will these guidelines discourage new business development but potentially put some current businesses in the forest products industry at risk.
69	Jere Hamel	Futurewood Corp	I think you are focusing too much effort on collecting some of this information on state owned lands first. Much of the required information collection could come quicker from private and industrial lands, thus reducing the cost of incorporating it into the state system.
70	Jane Severt	WCFA	It is a given that the guidelines will not be voluntary under 3 <sup>rd</sup> party forest certification. Therefore, it is important to view the guidelines as a living document that needs to be periodically reviewed for updates and changes.



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71	Jane Severt	WCFA	As the need for alternative, renewable energy sources grows, developing woody biomass markets also have the potential to grow. This will provide opportunities for monitoring and observation as biomass harvests occur across the landscape. Biomass harvest monitoring should be occurring across different ownerships, not only on state lands. Several ownerships other than the state have been conducting harvests that include the removal of woody biomass.
72	Jane Severt	WCFA	It is a good idea to follow the protocol that has been utilized in monitoring for compliance to "Wisconsin's Forestry Best Management Practices for Water Quality". Increased efficiencies may be realized by conducting the monitoring for both simultaneously.
73	Jane Severt	WCFA	There is no need to develop a separate checklist for timber sale administration on biomass harvests. Existing timber sale checklists could be modified to accommodate biomass harvesting. All counties have a checklist that is put into the timber sale file.
74	Jane Severt	WCFA	WDNR 2460's should be modified to allow for easier tracking of biomass harvesting on county and state forests.
75	Lynn Wilson	Plum Creek	Monitoring methods will not have reasonable bounds on error estimates. Monitoring at a level to achieve an accurate estimate will be costly in both time and money.
76	Jonathon Gilbert	GLIFWC	This is a critical component of implementation of biomass harvesting guidelines. We learn much from our forests by practicing adaptive management. This is only possible by monitoring the results of our management activities and evaluating their results. This should be a stated purpose of monitoring. Inclusion of fine woody debris monitoring should be built into the WisCFI inventory. This would aid in this adaptive management approach.
77	Menominee	Tribal Input	Monitoring would be something that this Department (Tribe) would definitely be interested in. MTE usually waits for WI-DNR to develop criteria anyway and then it is implemented (ex. using State Water Quality BMP's). I would assume MTE would want a checklist developed for their Closure and Compliance documents and I'm sure my Department and the Bureau would be interested in knowing how closely any new activities of this possible magnitude are being monitored by MTE.
<b>Updating and Information Management</b>			
78	Jere Hamel	Futurewood Corp	I see no need to produce a field manual within the next 3-5 years. So much is subject to change and much of it would be repetitive with other manuals currently in use.
79	Earl Gustafson	WI Paper Council	If it becomes apparent, as new or additional research or operational information becomes available, that the guidelines need to be modified to further assure the health and productivity of Wisconsin forests, then we should act in a timely manner. And if it becomes apparent that the guidelines are counterproductive to the development of sustainable biomass harvesting (which is not disruptive or destructive to existing forest product firms), then the causes should be promptly identified, investigated, corrected or mitigated.
80	Earl Gustafson	WI Paper Council	I believe the DNR, members of the BHG Advisory Committee, and the engaged stakeholders, have done their sincere best to develop precautionary guidelines that will be carefully and thoughtfully implemented. I only wish I did not have an unsettling sense that we may have missed the public policy "sweet spot" and have been insupportably precautionary. However, I trust that Wisconsin's tradition of cooperative problem solving, engaging the collaborative resources of government, academia, industry and the public, will enable us to make any necessary corrections.
<b>General Comments about the Guidelines</b>			
81	Jan C. Harms	UWSP - College of Natural Resources	It seems to me that any guideline must reflect a combination of <b>very sound</b> biological information and very realistic, <b>reliable economic</b> information. I am convinced that we have the cart way ahead of the horse.
82	Dave Hoppe	Forest Service	The Chequamegon-Nicolet NF is supportive of the BHGs to date and is already incorporating them into our environmental analysis for future projects.
83	Nancy Bozek	WWOA	The Wisconsin Woodland Owners Association (WWOA) supports the recognition by the Advisory Committee and Council on Forestry that there is not enough data available at this time to support the creation of final Woody Biomass Harvesting Guidelines.
84	Earl Gustafson	WI Paper Council	We employed the precautionary principle and so have been cautious in several areas where there is scant research available to guide decision making today and where any potential harmful effects will not be apparent until after multiple rotations, or 120-240 years have passed. We have heard that timber producers are concerned that some options considered would make their crucial participation in biomass markets impossible for economic reasons. Additionally, we have been advised that documenting compliance with some of the guidelines may be impossible, nearly impossible, or administrative nightmares.



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85	Lynn Wilson	Plum Creek	The DNR is attempting to regulate fine woody debris removal/retention when there isn't a clear understanding of the quantitative relationship between it and productivity.
86	Lynn Wilson	Plum Creek	Given the variability inherent among sites, setting a standard for specific quantities of biomass retention is impractical and unnecessarily prohibitive.
87	Lynn Wilson	Plum Creek	Soil series identified as too nutrient poor to support biomass removals are based on a mass balance approach that has incomplete data and uses assumptions on: 1) total site nutrient capital; 2) a tree's ability to exploit more than the upper portion of the soil profile; 3) actual contribution of biomass to the overall site nutrient pool; and 4) inputs from wet and dry deposition, weathering, mineralization and exchanges at the root-soil interface
88	Lynn Wilson	Plum Creek	We agree with the intent of "Wisconsin's Forestland Woody Biomass Harvesting Guidelines", but remain concerned that the guidelines are too narrowly focused. We agree that all forest management including biomass production should fall within the framework of sustainable forest management
89	Lynn Wilson	Plum Creek	The biomass retention level put forth in section 3.A, needs greater consideration given the differences that can be expected in site nutrient recovery and replacement, particularly the lack of consideration for site nutrient amelioration <b>if</b> a sustainability issue is identified. We are opposed to the biomass retention level i.e. five dry tons (equivalent to approximately 10 green tons).
90	Lynn Wilson	Plum Creek	One size fits all doesn't work in a diverse forest: the site, species and seasonality variables contributing to the calculation of nutrient use, removal and site recovery are too highly integrated to provide for a single per acre retention quantity. The harvest constraints are defined under worst case scenarios.
91	Jonathon Gilbert	GLIFWC	Before I comment on the woody biomass harvesting guidelines implementation efforts I want to say a word or two about the guidelines themselves. I understand that the content of the guidelines is not open to comment at this point. However, I also understand that there were changes made to the harvesting guidelines at the very last minute that were unavailable for comment prior to their inclusion. These changes were outside of the guidelines that were reviewed by the technical experts earlier on in the process and the changes were never exposed to tribal scrutiny.
92	Jonathon Gilbert	GLIFWC	The most conspicuous change in the harvesting guidelines was in the requirement to leave only 10% of the fine woody debris on site after harvesting. Prior drafts of the guidelines, in fact all prior drafts, urged the retention of 30% of the fine woody debris. This is the quantity that MNDNR uses in their guidelines and the Wisconsin guidelines were modeled after those in MN. It was unclear why this amount was cut in third. Fine woody debris has valuable functions in forested ecosystems. As an example waabzheshi or American marten use hollow trees for their maternal den sites. We have found ( <a href="#">Gilbert, Wright, Lauten, Probst, 1997. Den and rest site characteristics of American marten and fisher in northern Wisconsin. <i>Martes: Taxonomy, ecology, techniques and management</i>, pg 135-145. G. Proulx, Bryant, and Woodard eds. Provincial Museum of Alberta Edmonton, Alberta CA</a> ) that the quantities of fine woody debris surrounding these den sites was significantly greater than that found randomly throughout the forest. This is but just one example, I am sure that there are others.
93	Jonathon Gilbert	GLIFWC	The second change in the harvesting guidelines involved the deletion of the snag and tree retention guidelines. I understand that these are provided elsewhere in silviculture handbooks but repetition can be helpful. In addition the reference to the silviculture guidelines is just a reminder that they exist. It does not say that they also apply to biomass harvested forests. This should be strengthened.
94	Jonathon Gilbert	GLIFWC	The third area of concern on the biomass harvesting guidelines is the list of reasons why the guidelines may be modified. It includes site preparation, invasive control, fuel reduction, habitat restoration or prescribed fire. These are broad reasons and can easily be fit into nearly any harvest situation. I would encourage more specificity provided to these modifications.
95	Lac du Flambeau	Tribal Input	A concept he returned to several times was that they must manage with the seventh generation in mind. So they are thinking of the consequences of today's management on the next 150 years. He shared a story that he was at Leech Lake at a conference last summer and the topic was climate change. The speaker said that Leech Lake could have the climate of Kansas. That gave tribal members a lot of concern and one commented that unless something is done about climate change there might not be a seventh generation.
96	Lac du Flambeau	Tribal Input	LdF understands the role that biomass can have in energy policy but remain concerned about the impacts of removing too much biomass from a site.

Line #	Submitted by	Affiliation	Comment
	LCO	Tribal Input	There was a lot of discussion regarding the proposed guidelines. Especially regarding the change from 30% set aside to 10%. Originally the proposal had 30%. We also felt that there is no monitoring of effects or science going on to make sure there are no major detrimental impacts. I believe also they didn't want the den tree issue in the plan and we want that in.
97	Ho Chunk	Tribal Input	Long term impacts on the land. May conflict with tribal history, land ethics and philosophy - elders may have issues
98	Stockbridge	Tribal Input	Main concern is the amount of woody material taken when harvesting biomass, leaving not enough variation in size of material on the forest floor for nutrient recycling as logging slash decomposes over time. Besides that they were on board with the Guidelines.
99	Oneida	Tribal Input	Has no problem with the Woody Biomass Guidelines.
<b>Misc Comments</b>			
100	Jan C. Harms	UWSP - College of Natural Resources	I would much prefer that the DNR utilize their scarce resources in developing the information, research and systems for some distant future guideline than continue with this premature effort.
101	Jan C. Harms	UWSP - College of Natural Resources	In order to have reliable economic information about the costs and benefits of Biomass Harvesting the harvest systems must be well defined. We have barely scratched the surface with regard to developing practical systems for harvesting and utilizing the biomass. The efficiency of the systems in utilizing small wood and twigs will undoubtedly have an effect on the biological impacts. We have yet to identify the goals for the material to be harvested, let alone the systems and costs to accomplish it.
102	Lynn Wilson	Plum Creek	Plum Creek believes that the increased use of wood for producing energy to meet Wisconsin's energy needs is beneficial to society and also represents a potential new and expanding business opportunity for land owners, loggers, utilities and the state of Wisconsin.
103	Lynn Wilson	Plum Creek	Energy produced from cellulose, including wood, is critical in meeting Wisconsin's energy goals and needs. This supports Governor Doyle's leadership in energy independence and Wisconsin's leadership in the emerging bioeconomy.
104	Lynn Wilson	Plum Creek	Sustainable forestry and its long term planning schedule produces energy feedstocks and other forest products and matches the long term investment horizon for new biofuel.
105	Lac du Flambeau	Tribal Input	The Lac du Flambeau tribe is toying with developing an energy plan of their own and may try some chip/biomass sales. He feels they must be extremely careful on tribal lands though.



## Public Listening Session Attendance

February 10, 2009 - Madison

<b>Name</b>	<b>Organization</b>
Rep. Don Friske	35th Assembly District
Rep. Fred Clark	42nd Assembly District
Anita Tegen	Alliant Energy
Jim Hoppe	Council on Forestry
Jere Hamel	Futurewood Corp.
Jonathan Gilbert	GLIFWC
Henry Schienebeck	GLTPA
Bill Johnson	Johnson Timber
T.J. Morice	MARTH
Gary Wyckoff	Plum Creek Timber
Lynn Wilson	Plum Creek Timber
Andy Cook	Potlatch
Matt Dahlman	The Nature Conservancy
David MacFarland	UW
Mike Peterson	Washburn County Forests
Jane Severt	WCFA
Bob Mather	WDNR
Darrell Zastrow	WDNR
Jeff Barkley	WDNR
Karl Martin	WDNR
Paul DeLong	WDNR
Carmen Wagner	WDNR
Sarah Herrick	WDNR
Ed Moberg	WWOA
Gene Roark	WWOA
David Donovan	Xcel Energy

# Biomass Harvesting Guidelines

## Voluntary Nature of Guidelines:

- These guidelines will not be voluntary, they will become the standard. Much like the BMP's are supposedly voluntary, there is a certain standard of how we conduct our business and we must all adhere to it at a level above or equal to the standard established. Thus not making the BHG voluntary. All of the lands we manage regardless of ownership (private vs. public), (MFL vs. Non-MFL) all require the same level of performance. By this I mean that regardless of ownership we have agreed to adhere to certain guidelines we must follow, we can not prescribe something on a particular land just because of the ownership. Any entity that is certified (SFI, FSC) will have to strictly follow these mandatory guidelines and will have to verify through audit procedures, documentation, etc. they are in compliance. This means there will be a substantial additional cost in time, resource allocation, and dollars at a time when many in our forest products industry are severely struggling to survive.

## Guideline Flexibility:

- With the biomass harvesting industry being so new the evolving change will occur very quickly. Many consumers of biomass will require different feedstock's in relation to the end product they are producing. Thus, we will see different levels of biomass being removed from each site. We have already seen this with the few biomass consumers already. With that said, all biomass harvesting is grouped into the same category, regardless if you use the whole tree (limbs, branches) or maybe only down to a 2" top (bole, stem).
- You reference "Experimental Techniques" that can be used to increase our knowledge based on management practice objectives. Who determines these "Experimental Techniques" and who will supervise? I would suggest that someone who is only removing material to a 2" top diameter should be classified in this "Experimental Techniques". I don't see how you can implement something if your not sure of the results yourself.
- You have stated that further research is needed to be collected on sites with low quality soils (dry nutrient-poor sandy soils). Funding will become available July 1, 2009 and will last for 2 years, possibly 3 years. Can we realistically expect to see the results in the soil productivity in such a short time period? Also, you have stated that it takes 14 + years to make a change in the Silvicultural Handbook, we can not wait that long in this new emerging industry. **Keep in mind the initiative set forth by our governor.**

## Implementation Timetable, 2009-2011:

- With all different types of ownerships, there is no reason why we can not begin to train, implement, monitor and research on all entities of ownership. I'm lead to believe that you could probably get faster results from private sales vs. waiting for public sales to become available. A vast majority of public sales will be sold to contractors who at this time do not harvest biomass.
- You are suggesting no changes to the MFL until 2010, a vast majority of training, implementation; monitoring and research could be done on these properties immediately. Private owners are some of the best stewards of the land available, yet, we are waiting until last to implement biomass guidelines to them.

## Monitoring:

- How can we monitor sites if we don't have all the tools in place now?
- Cost is an ongoing concern that you have on all aspects and rightfully so, are we trying to gather too much information on a limited budget. Is this constraint going to limit the feasibility and "common sense approach" to gathering the required information? The industry cannot incur anymore cost into supporting this collection and monitoring system.
- If we cannot get the monitoring and collection system up and running before 2012 we will have discouraged many businesses from coming to our state. Yet, at the same time we are going to discourage businesses from coming because we don't have the information to make an intelligent decision, thus making guidelines (laws), on speculation without supporting documentation. Not only will these guidelines discourage new business development but potentially put some current businesses in the forest products industry at risk.
- I think you are focusing too much effort on collecting some of this information on state owned lands first. Much of the required information collection could come quicker from private and industrial lands, thus reducing the cost of incorporating it into the state system.

## Research:

- Any amount of research collected from 2009 -2012 is going to generate equal to or more research from the original. Thus creating a long timetable for evidence. One example of this would be the retention of 2 inch and smaller FWM vs. whole tree and the impact on low quality soils.
- You state funding will become available July 1, 2009 do you have a plan in place and ready to implement. Is this research funding going towards the areas of greatest need and the development of further biomass harvesting, or is it feeding a wish list that will benefit only the researchers?
- Why would we need to create computer simulations to obtain the **desired** results? This research that is going to be collected is going to give us the actual results not the desired results we have already formulated without proper research.

## Site Differentiation:

- The option of using the existing resources within the WDNR is fine, our first step should be allocating funds to the research based on concerns of potential nutrient depletion, based upon harvesting techniques (2" vs. whole tree).

## **Training:**

- With so much being unknown about soil depletion and field measurement protocols how can we train people if we are not sure ourselves
- Time is of the essence
- We don't have a number of years to train everyone
- We can not effectively setup sales and administer sales until people are trained? With the implementation timetable that has been presented already we are looking at training DNR staff sometime in 2009 and you have proposed implementing FWM in the fall 2009 bid opening. Is it feasible that we can train DNR staff in a period of approximately 6 months, or are we just not going to allow FWM to be harvested until training has occurred? I would be lead to believe that it would be near impossible to get staff trained within the next 6 months, which will only prolong the process of being able to harvest FWM.
- An on-line presentation would greatly expand the number of constituents. Plus, many would be able to take the training at their convenience.
- Many loggers would benefit if the training was incorporated into the FISTA classes offered. Many of the current FISTA classes are repetitive for many, so I'm sure any new material being offered would create interest.
- Can we honestly administer and enforce any of the guidelines until proper training is completed.

## **Updating and Information Management:**

- I see no need to produce a field manual within the next 3-5 years. So much is subject to change and much of it would be repetitive with other manuals currently in use.

## **Field Implementation:**

- The field implementations of BHGs are not specific to forest ownership(s). With the certification of SFI and FSC we need to apply the guidelines to all ownerships.
- You reference "the need to develop actual field implementation tools which can be used by foresters, loggers and landowners to measure if the BHGs are being applied according to the specific site prescription", without this how can we implement the BHGs even on an elementary scale.
- Some agencies at this time are very reluctant even to consider biomass harvesting due to financial considerations. One the first steps we need to take is that if harvesting biomass will not adversely effect the management goals that it must be allowed to occur. Quite often goals and objectives are misconstrued, and personal agendas override management goals. To meet our goals and energy initiatives (reducing our dependence on fossil fuels at stated by Governor Doyle) biomass utilization must be able to be done cost effectively, efficiently, and without proving to be so overly burdensome as it will become if these guidelines are implemented. Woody biomass is a renewable resource which, if utilized, will provide a huge economic boost to our industry and Wisconsin's economic well being. Personal agendas can not come into play.

Sincerely,

Jere Hamel

Futurewood Corp.





United States  
Department of  
Agriculture

Forest  
Service

**CHEQUAMEGON-NICOLET NATIONAL FOREST**  
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715-762-2461  
715-762-5179 (Fax)  
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Rhineland Supervisor's Office  
68 S. Stevens St.  
Rhineland, WI 54501  
715-362-1300  
715-362-1359 (Fax)  
Internet: [www.fs.fed.us/r9/cnnf](http://www.fs.fed.us/r9/cnnf)

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File Code: 2400  
Date: February 19, 2009

Paul Delong  
State Forester  
Wisconsin Department of Natural Resources  
PO Box 7921  
Madison, WI 53707-7921

Dear Paul,

Thank you for the opportunity to comment on the draft Biomass Harvest Guideline Implementation materials. The Chequamegon-Nicolet NF is supportive and in agreement with the overall implementation plan proposed over a three-year period on state, county and Managed Forest Law lands. We do not have any specific recommendations for changing the plan or selecting options at this time. The completed implementation plan will also be helpful to us when considering the application of the Biomass Harvesting Guidelines on the national forest.

Sincerely,

*/s/ Jeanne M. Higgins*  
JEANNE M. HIGGINS  
Forest Supervisor

cc: Sarah Herrick



February 23, 2009

Sarah Herrick  
Wisconsin DNR – Division of Forestry  
PO Box 7921  
Madison, WI 53706

Sarah:

Thank you for the opportunity to comment on the biomass harvesting guidelines implementation plans presented at the February 10, 2009 meeting. I have reviewed these implementation plans from a scientific perspective guided by my knowledge of off-reservation treaty rights. As this implementation process is on-going I am sure there will be further opportunities to participate in this important effort.

Before I comment on the woody biomass harvesting guidelines implementation efforts I want to say a word or two about the guidelines themselves. I understand that the content of the guidelines is not open to comment at this point. However, I also understand that there were changes made to the harvesting guidelines at the very last minute that were unavailable for comment prior to their inclusion. These changes were outside of the guidelines that were reviewed by the technical experts earlier on in the process and the changes were never exposed to tribal scrutiny.

The most conspicuous change in the harvesting guidelines was in the requirement to leave only 10% of the fine woody debris on site after harvesting. Prior drafts of the guidelines, in fact all prior drafts, urged the retention of 30% of the fine woody debris. This is the quantity that MNDNR uses in their guidelines and the Wisconsin guidelines were modeled after those in MN. It was unclear why this amount was cut in third. Fine woody debris has valuable functions in forested ecosystems. As an example waabeshshi or American marten use hollow trees for their maternal den sites. We have found (Gilbert, Wright, Lauten, Probst. 1997. Den and rest site characteristics of American marten and fisher in northern Wisconsin. *Martes: Taxonomy, ecology, techniques and management*, pg 135-145. G. Proulx, Bryant, and Woodard eds. Provincial Museum of Alberta Edmonton, Alberta CA) that the quantities of fine woody debris surrounding these den sites was significantly greater than that found randomly throughout the forest. This is but just one example, I am sure that there are others. In an attempt to address this issue I would urge that a question surrounding the quantities of fine woody debris retained in

biomass harvested stands and the impacts on the forest ecosystem be developed and included in the research portion of the implementation plan.

The second change in the harvesting guidelines involved the deletion of the snag and tree retention guidelines. I understand that these are provided elsewhere in silviculture handbooks but repetition can be helpful. In addition the reference to the silviculture guidelines is just a reminder that they exist. It does not say that they also apply to biomass harvested forests. This should be strengthened.

The third area of concern on the biomass harvesting guidelines is the list of reasons why the guidelines may be modified. It includes site preparation, invasive control, fuel reduction, habitat restoration or prescribed fire. These are broad reasons and can easily be fit into nearly any harvest situation. I would encourage more specificity provided to these modifications.

Below are my comments on the specific plans presented at the implementation meeting on February 9. I have divided my comments into sections corresponding to the elements of the implementation efforts.

Information management – no comments

Monitoring - This is a critical component of implementation of biomass harvesting guidelines. We learn much from our forests by practicing adaptive management. This is only possible by monitoring the results of our management activities and evaluating their results. This should be a stated purpose of monitoring. Inclusion of fine woody debris monitoring should be built into the WisCFI inventory. This would aid in this adaptive management approach.

Field Implementation - This element dove-tails with the monitoring element in that methods must be developed to measure the quantities of fine woody debris left behind. I recommend that option 2 be selected that calls for research to develop and field test measurement tools.

Training - Training opportunities should be afforded to tribal natural resources staff and forestry operations. In addition, Bureau of Indian Affairs foresters may be in need of training as well.

Site Differentiation - On forested lands where management plans are required, sites available to biomass harvest under the guidelines should be identified. This should be one effort in master planning. Identifying sites on a project by project basis does not allow for evaluation of cumulative effects.

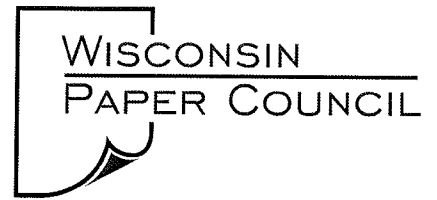
Research - This is also a critical component of the implementation efforts. I have already mentioned a couple of new research efforts that should be undertaken (i.e., retention guidelines, field measurement tools). Why the subject of this initial research project was chosen is a bit unclear. This

research would evaluate the effects of biomass harvesting on forests that are not open to such harvests under the current guidelines. It appears that the reason for this research is to demonstrate that biomass harvesting has no or little effects on this habitat type thus the restriction is unnecessary. This is not how science works (proving a negative). There are many much more relevant research topics that should be developed. This one is unneeded.

Thank you once again for the opportunity to comment on the guidelines and implementation plans. I remain interested in following this effort as it continues to unfold. Please continue to keep me informed of progress.

Sincerely,

Jonathan Gilbert Ph.D.  
Wildlife Section Leader



February 23, 2009

Ms. Sarah Herrick  
Division of Forestry  
Department of Natural Resources  
101 South Webster Street  
Madison, WI 53707

SUBMITTED ELECTRONICALLY

Dear Ms. Herrick:

I am a member of the Biomass Harvesting Guidelines (BHG) Advisory Committee and was tasked to address related issues and concerns that are primarily energy-related.

For that reason, I have no detailed comments to offer on the draft implementation plan specifically.

There are individuals from our association, and other stakeholders, who are more educationally and professionally qualified to address individual aspects of the plan.

I would generally observe, however, that the implementation plan appears to be well thought out and developed. It is evident that it is the product of individuals who are committed to the opportunities biomass harvesting represents and who are equally committed to assuring that the diverse concerns raised during the creation of the BHG are addressed in the document and the implementation plan.

That said, I may be redundant, but would be remiss, if I failed to discuss a final concern about the BHG and its impact on the environment and the forest products community.

Creation of the BHG was, and will continue to be, a public policy balancing act.

Wisconsin is a leader in sustainable forestry – particularly in achieving compliance with several rigorous, third party certification programs – and our collective concern with the environment was clear throughout the process. Appropriately so.

At the same time, the guidelines – although nominally voluntary – will be a compliance reality for land owners and managers, industries dependent on wood and biomass, and timber producers. As such, it would be counter-productive to Wisconsin's interest in the development of renewable energy if the guidelines were to preclude or materially suppress sustainable biomass harvesting by being unnecessarily rigid or by imposing unaffordable costs on participants anywhere in the chain from forest to end-users.

I do not know now how well the BHG and the implementation plan balance those concerns. We employed the precautionary principle and so have been cautious in several areas where there is scant research available to guide decision making today and where

any potentially harmful effects will not be apparent until after multiple rotations, or 120-240 years, have passed. We have heard that timber producers are concerned that some options considered would make their crucial participation in biomass markets impossible for economic reasons. Additionally, we have been advised that documenting compliance with some of the guidelines may be impossible, nearly impossible, or administrative nightmares.

That brief recap of some of the concerns with the BHG brings me to recommendations. The DNR needs to continue the exemplary sensitivity – employing listening, analytical and compromising skills – it has shown throughout this process as an implementation plan is rolled out and the on-the-ground reality of the BHG become known.

If it becomes apparent, as new or additional research or operational information becomes available, that the guidelines need to be modified to further assure the health and productivity of Wisconsin forests, then we should act in a timely manner. And if it becomes apparent that the guidelines are counterproductive to the development of sustainable biomass harvesting (which is not disruptive or destructive to existing forest products firms), then the causes should be promptly identified, investigated, corrected or mitigated.

Those are, clearly, very generalized observations and recommendations. I believe the DNR, members of the BHG Advisory Committee, and the engaged stakeholders, have done their sincere best to develop precautionary guidelines that will be carefully and thoughtfully implemented. I only wish I did not have an unsettling sense that we may have missed the public policy “sweet spot” and have been insupportably precautionary. However, I trust that Wisconsin’s tradition of cooperative problem solving, engaging the collaborative resources of government, academia, industry and the public, will enable us to make any necessary corrections.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Earl Gustafson". The signature is written in a cursive, flowing style.

Earl Gustafson  
VP – Energy, Forestry & HR

ejg

Sarah,

I would like to make a brief comment regarding the Biomass Harvesting Guideline effort that is currently underway. It seems to me that any guideline must reflect a combination of **very sound** biological information and very realistic, **reliable economic** information. I am convinced that we have the cart way ahead of the horse.

In order to have sound biological information about Biomass Harvesting impacts, I am convinced that one must research and track multi-rotational harvests under a variety of harvest intensities. While researchers have toyed with these questions for more than 30 years, I do not believe we have the needed results, primarily due to the detail needed and the difficulty and cost of multi-rotational studies.

In order to have reliable economic information about the costs and benefits of Biomass Harvesting the harvest systems must be well defined. We have barely scratched the surface with regard to developing practical systems for harvesting and utilizing the biomass. The efficiency of the systems in utilizing small wood and twigs will undoubtedly have an effect on the biological impacts. We have yet to identify the goals for the material to be harvested, let alone the systems and costs to accomplish it.

I would much prefer that the DNR utilize their scarce resources in developing the information, research and systems for some distant future guideline than continue with this premature effort. Sarah, I do not know whether you are the appropriate person to receive this type of comment but trust that you will forward this comment to the appropriate individuals.

Jan C. Harms  
Forestry Coordinator  
College of Natural Resources  
UWSP  
Stevens Point, WI 54481

(715) 346-2104



Sarah,

I have reviewed each of the draft implementation documents and do not have any substantive comments for improvements or recommendations for prioritizing the options given. This is primarily due to the fact that most of the options hinge on whether existing resources or funding is available and only the WDNR can make those determinations. I would suggest that the research, especially on nutrient-poor soils, move forward as soon as possible, due to the potential long-term nature of such studies.

The Chequamegon-Nicolet NF is supportive of the BHGs to date and is already incorporating them into our environmental analysis for future projects. Thank you for the opportunity to comment.

Dave

David J. Hoppe  
Forest Soil Scientist  
Chequamegon-Nicolet NF  
68 South Stevens Street  
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Phone: 715-362-1366  
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I offer a few comments on the draft BHG implementation plan:

1) The start of biomass implementation on state owned lands for this coming fall is not realistic. Many of the state sales to be offered for bid this fall have already be established or are currently being established right now. Tying the implementation to bids is 6-12 months too late. The field and office work by foresters is completed many months in advance of the bids. The BHG guidelines have not been rolled out nor has the associated training been offered to field foresters. Sales have already been designed, volumes estimated, data entry completed, and approvals made for such sales. Field folks have been working hard on TSE and asking them to redo sale designs, narratives, volume estimates, and prospectuses is very inefficient. More lead time is needed than what is proposed.

The implementation has to provide sufficient lead time for training and technical issues to be incorporated into the sale design. I recommend that the implementation on state lands at minimum parallel the timeframe proposed for county forests. The BHG manuals or technical guides are not available ye to instruct field staff on the parameters of BHG as they apply to state lands.

2) Research needs. Field input into the research needs is needed. I believe additional work is necessary to determine the top priority for research. Could additional effort be invested in screening for already completed research.

3) Timber sale contract enforcement in 2009? How can this start in2009 without training, without contract language, without logger education.....? We are already in February 2009.

4) Site differentiation tools. Habitat classification provides only a small part of this solution especially since most of the TSE work is done in fall, winter, and spring without use of indicator species. And the NRCS soil maps provide such a broad range of soil characteristics on specific site , that I'm not convinced this provides a ready to use tool yet. I think the development of such site differentiation tools will involve much more ground truthing that has been anticipated and will not be ready for the summer season.

Michael Luedeke  
NOR Forestry Leader  
810 W. Maple St.  
Spooner, WI 54801  
(715) 635-4157  
(715) 635-4105 FAX

Ms. Herrick-

Comments for consideration following the February 10<sup>th</sup> Madison meeting to review the DRAFT Implementation Plan Wisconsin's Forestland Woody Biomass Guidelines (BHG).

**Comments and questions addressing the BHG Implementation Plan process:**

- During the Governor's Council meeting in December, Rep. Hubler made a motion and a discussion ensued on voluntary vs. mandatory guidelines. To address MFL requirements, Forest Management Guidelines (FMG's), and the Silviculture Handbooks, I expected a "phased in" approach. In the Implementation Timetable, "**active enforcement, compliance, screening against guidelines**" are indicated in 2010 and 2011 prior to the initial research being completed and more advanced site differentiation tools would be available.
- Training is a key to implementation – and has a proven track record in the evolution of the Water Quality BMP's – more effective than monitoring and regulation. How will this training be paid for and in what forum do you expect to deliver the training? DNR workshops, FISTA module, Logging Congress? Considering the current financial position the State of Wisconsin and the forest industry, I'm concerned that there won't be adequate resources for this important component.
- The Research RFP process should have stakeholder oversight. I have followed up with the UW-Madison College of Life Sciences and Agriculture and they support this approach. Including wood consuming facilities, loggers, landowners, and academic expertise provides increased collaboration and leverage the best available science.
- Field implementation refers to "**develop methods to measure fine woody debris i.e. visual reference, transects, etc**" in 2009. How will this be accomplished with current DNR staffing, budgets, and priorities? Followed by "**assess effectiveness of measurement tools...**" in 2010? Considering the current financial position the State of Wisconsin and the forest industry, I'm concerned that there won't be adequate attention to this step.
- Is the DNR proposing on State Land (2009) and County Land (2010) stumpage sales planning to harvest FWM be "**screened**" and biomass removal not allowed? My understanding was that this is a 3-year implementation process.
- The Site Differentiation Tool to determine sensitive sites is an extensive undertaking. If a "**disagreement or confusion about the status of a borderline dry nutrient- poor sandy site**" occurs, will the DNR and other resources be available to be the "on-site consultants" reference in the draft documents.

**Technical comments to consider for the BMP's and the research needed to address stakeholder's questions:**

- As discussed on February 10<sup>th</sup>, the research proposals are too short-term and site specific to address the broad question of nutrient depletion. 2-3 years is too short-term to provide information on site nutrient rebuild and quantify actual depletion if any.
  - The studies need to have some test of indicator of nutrient depletion, e.g. foliar concentrations, tree growth

- Soil amendments should be tested for effectiveness of replacing nutrients removed. The use of fertilizers and wood ash should be considered as means to address any potential depletion problem identified. Sustainable agriculture practices using fertilization and other amendments have a long history in Wisconsin. And there is considerable science available for forest fertilization.
- The DNR is attempting to regulate fine woody debris removal/retention when there isn't a clear understanding of the quantitative relationship between it and productivity.
- Given the variability inherent among sites, setting a standard for specific quantities of biomass retention is impractical and unnecessarily prohibitive.
- Monitoring methods will not have reasonable bounds on error estimates. Monitoring at a level to achieve an accurate estimate will be costly in both time and money.
- Soil series identified as too nutrient poor to support biomass removals are based on a mass balance approach that has incomplete data and uses assumptions on:
  - total site nutrient capital
  - a tree's ability to exploit more than the upper portion of the soil profile
  - actual contribution of biomass to the overall site nutrient pool
  - inputs from wet and dry deposition, weathering, mineralization and exchanges at the root-soil interface
- Indicators of nutrient depletion (e.g. foliar concentrations) or tree growth effects on soils considered too nutrient poor to support biomass removals should be used rather than avoiding harvests on these soils.

**Summary comments for Wisconsin's Forestland Woody Biomass Guidelines:**

- Plum Creek believes that the increased use of wood for producing energy to meet Wisconsin's energy needs is beneficial to society and also represents a potential new and expanding business opportunity for land owners, loggers, utilities and the state of Wisconsin.
- Energy produced from cellulose, including wood, is critical in meeting Wisconsin's energy goals and needs. This supports Governor Doyle's leadership in energy independence and Wisconsin's leadership in the emerging bioeconomy.
- Sustainable forestry and its long term planning schedule produces energy feedstocks and other forest products and matches the long term investment horizon for new biofuel.
- We agree with the intent of "Wisconsin's Forestland Woody Biomass Harvesting Guidelines", but remain concerned that the guidelines are too narrowly focused. We agree that all forest management including biomass production should fall within the framework of sustainable forest management

- The biomass retention level put forth in section 3.A, needs greater consideration given the differences that can be expected in site nutrient recovery and replacement, particularly the lack of consideration for site nutrient amelioration if a sustainability issue is identified. We are opposed to the biomass retention level i.e. five dry tons (equivalent to approximately 10 green tons).
- One size fits all doesn't work in a diverse forest: the site, species and seasonality variables contributing to the calculation of nutrient use, removal and site recovery are too highly integrated to provide for a single per acre retention quantity. The harvest constraints are defined under worst case scenarios.
- Although the guidelines are presented as voluntary, documentation is required to deviate from them; a written justification for not following guidelines is counter to the voluntary intent. Our concern is the guideline implication on biomass harvests on lands enrolled under the Managed Forest Law where harvests must be authorized by the WDNR. A harvest plan that does not meet the voluntary biomass guidelines is too open to interpretation by the regulator reviewing and ultimately signing off on the harvest plan. It will be important to private landowners choosing to enter the biomass market to understand and expect that these guidelines are voluntary.

Respectfully submitted,  
Lynn

Lynn Wilson  
General Manager - Lake States Region

**Plum Creek**

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Dear Ms Herrick,

The Great Lakes Timber Professionals Association would like to respectfully submit the following comments on the Bio Mass harvesting Guideline Implementation Plan;

At the Governors Council on Forestry meeting in December when the guidelines were approved, it appeared to us that it was the councils intention to keep the guidelines voluntary until three years of data had been collected. Based on the conversation before approving the guidelines, it was also our understanding that the collection of data is necessary to help develop methods to measure fine woody debris i.e. visual reference, transects, ect, and assess the effectiveness of measurement tools. It also appears to us that there is much disagreement and or confusion about the status of borderline dry nutrient-poor sandy soil sites. With that in mind it would be imperative that the guidelines remain voluntary until the data is collected and agreed to by all parties, so that the guidelines can meet the requirements of sound forestry practices. Given the state of the budget and the amount of time required to collect the data we would question whether or not 3 years is even enough to keep the guidelines voluntary.

In the guideline implementation plan, enforcement is already mentioned by the year 2010 yet there is no mention of logger training until 2011. Wouldn't you agree that it would more beneficial for loggers to receive training during the "voluntary" period, along with foresters and others, to have a smother transition into actual implementation of the guidelines? Wouldn't you also agree that moving slower but more efficiently with **all** the stakeholders would actually be faster in the long term?

It is our opinion that guidelines are only voluntary as long as loggers, landowners, foresters and government agencies are working together as a group, striving to achieve sustainable forests for multiple reasons.

Thank you.

Henry

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## St. Croix

No comments received

## Lac du Flambeau

He wonders what the science indicates- How much is enough to leave? How much can you take? He believes these are big questions which remain.

The Lac du Flambeau tribe is toying with developing an energy plan of their own and may try some chip/biomass sales. He feels they must be extremely careful on tribal lands though.

A concept he returned to several times was that they must manage with the seventh generation in mind. So they are thinking of the consequences of today's management on the next 150 years. He shared a story that he was at Leech Lake at a conference last summer and the topic was climate change. The speaker said that Leech Lake could have the climate of Kansas. That gave tribal members a lot of concern and one commented that unless something is done about climate change there might not be a seventh generation.

My impression is that LdF understands the role that biomass can have in energy policy but remain concerned about the impacts of removing too much biomass from a site.

## LCO

There was a lot of discussion regarding the proposed guidelines. Especially regarding the change from 30% set aside to 10%. Originally the proposal had 30%. We also felt that there is no monitoring of effects or science going on to make sure there are no major detrimental impacts. I believe also they didn't want the den tree issue in the plan and we want that in.

## Red Cliff

No comments received

## Bad River

No comments received

## Mole Lake

No comments received

## Ho Chunk



- Long term impacts on the land.
- May conflict with tribal history, land ethics and philosophy - elders may have issues
- Implementation Plan talks about all lands - what does "all" mean (referenced table on Monitoring summary table)
- Are guidelines enforceable - need to be voluntary.
- Need to be science based but again not sure of long term impacts

### Stockbridge

Main concern is the amount of woody material taken when harvesting biomass, leaving not enough variation in size of material on the forest floor for nutrient recycling as logging slash decomposes over time. Besides that they were on board with the Guidelines.

### Menominee

Monitoring would be something that this Department (Tribe) would definitely be interested in. MTE usually waits for WI-DNR to develop criteria anyway and then it is implemented (ex. using State Water Quality BMP's). I would assume MTE would want a checklist developed for their Closure and Compliance documents and I'm sure my Department and the Bureau would be interested in knowing how closely any new activities of this possible magnitude are being monitored by MTE.

Even before implementation of the BHG's and utilization of 4" down to 2" diameter class materials this would most likely need to be addressed in our FMP and associated NEPA document. I guess it depends on how much would be removed and where it was being removed from. A monitoring protocol would probably be vital to the tribe obtaining approval for harvesting this forest product. Menominee would most likely need to look at existing BIA policies or regulations and whether we might conflict with any that are applicable to Menominee. Other tribes might have differing issues in this regard. I don't know how that relates to a state perspective though. Contracting language would probably also be a crucial element to this effort.

### Oneida

Has no problem with the Woody Biomass Guidelines.

### Forest County

No comments received

# Wisconsin County Forests Association



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**Rothschild, Wisconsin**

**Paul Lokken, Sr.**  
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**James Barrett**  
**Director-at-Large**  
**Minong, Wisconsin**

February 23, 2009

## Comments on Implementation of Wisconsin's Forestland Biomass Harvesting Guidelines

### MONITORING

- It is a given that the guidelines will not be voluntary under 3<sup>rd</sup> party forest certification. Therefore, it is important to view the guidelines as a living document that needs to be periodically reviewed for updates and changes.
- As the need for alternative, renewable energy sources grows, developing woody biomass markets also have the potential to grow. This will provide opportunities for monitoring and observation as biomass harvests occur across the landscape. Biomass harvest monitoring should be occurring across different ownerships, not only on state lands. Several ownerships other than the state have been conducting harvests that include the removal of woody biomass.
- It is a good idea to follow the protocol that has been utilized in monitoring for compliance to "Wisconsin's Forestry Best Management Practices for Water Quality". Increased efficiencies may be realized by conducting the monitoring for both simultaneously.
- There is no need to develop a separate checklist for timber sale administration on biomass harvests. Existing timber sale checklists could be modified to accommodate biomass harvesting. All counties have a checklist that is put into the timber sale file.
- WDNR 2460's should be modified to allow for easier tracking of biomass harvesting on county and state forests.

### SITE DIFFERENTIATION

- Using habitat type groups as a first check in determining whether sites are on dry nutrient-poor sands is a good idea. Habitat typing is a tool familiar to foresters. Much work has already been done in Wisconsin relative to the correlation of habitat types and soil types. The data housed by Pri-Ru-Ta RC&D should be considered for use in addressing this option. Please consider all available resources, especially those offered by other agencies to avoid duplicative efforts in this area.
- In the area of on-site consultations; consider all possibilities not just existing WDNR staff

### TRAINING

- This will be an extremely important aspect of the implementation. Consider the utilization of outside agencies to assist in the training.
- Tools for practitioners to use in the implementation of the guidelines will be more valuable than power point presentations that simply outline the guidelines.

- County foresters also need to be involved in the training, not just WDNR foresters, cooperating consulting foresters and loggers.

## RESEARCH

- Research needs in the area of biomass harvesting are huge. Due to the immediacy of the need, it appears that research in the area of biomass harvesting and its effects on forest sustainability should be a priority in Wisconsin. The demand for renewable sources of alternative fuels will most likely continue to grow and reoccur in the future. The sudden interest in woody biomass as a source for an alternative fuel source has set the stage for the identification of our shortfalls regarding adequate research in this area. If we would have been conducting more research or doing better monitoring on whole tree harvest operations in our state over the past 20-30 years perhaps we would have better data for making decisions regarding biomass harvesting today. Hindsight may be 20/20 but we should count this as a lesson learned and begin the research that will take decades to complete but hopefully will in the long run provide the answers we need for future decisions.
- Many important research needs have been identified during the development of the guidelines. The topics identified under the category of soil nutrients appear to be a high priority.
- The lack of research in Wisconsin regarding the removal of fine woody material from forests is an additional reason why the guidelines need to be periodically reviewed before they become incorporated into any document that outlines specific acceptable practices in any forest management manual.
- Realistically, we are not going to learn what we need to know about forest sustainability related to biomass harvesting in a period of three years.

## FIELD IMPLEMENTATION

- Field implementation on county forest lands should coincide with the implementation on state lands. This will be more acceptable to forest certification auditors.

## OVERALL COMMENTS

- Implementation and acceptance of the guidelines will be most difficult in areas identified with poor nutrient and shallow soils
- Economics will most certainly play a role in the acceptance level of guideline implementation though forest sustainability should be the primary focus
- We recognize that financial resources necessary to conduct research will be challenging to obtain. Wisconsin's entire forestry community must work together to address the identified needs.

These comments were prepared and submitted by Jane Severt, Executive Director of the Wisconsin County Forests Association. Thank you for the opportunity to provide these comments.

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# Wisconsin Woodland Owners Association, Inc.

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**still growing!**

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EXECUTIVE DIRECTOR**

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February 23, 2009

Sarah Herrick  
WI DNR  
[Sarah.Herrick@wisconsin.gov](mailto:Sarah.Herrick@wisconsin.gov)

Dear Sarah,

The Wisconsin Woodland Owners Association (WWOA) supports the recognition by the Advisory Committee and Council on Forestry that there is not enough data available at this time to support the creation of final Woody Biomass Harvesting Guidelines.

In light of this, WWOA is requesting that another area of the woody biomass issue be studied – creation of yield tax figures under the Managed Forest Law (MFL) program. There is very little data on prices, weights, conversion factors and species types as it relates to biomass harvesting. Dues to these factors, WWOA is requesting a 5-year moratorium be placed on charging yield tax for woody biomass harvested. This time period will allow for the collection of meaningful timber sale data to establish regional biomass rates for the yield tax tables.

Recently, WWOA has become aware that WI DNR is instructing MFL landowners harvesting woody biomass to use the yield tax tables for fuelwood. Based on current biomass prices, this will result in MFL landowners paying 50% or more tax on these products. We feel the fuelwood rates do not accurately portray the current woody biomass markets. Current yield tax rates are determined by using regional sales information along with the parameters of cords, board feet or cubic feet of material. Fuelwood markets tend to be hardwood species sold in cords. However, when it comes to biomass, the parameter will be in tons and more softwoods or mixing of species may occur resulting in variable weights from region to region. In addition, biomass harvesting is being conducted in two different manners on the land, for some timber sales biomass is the primary product and on others it is supplementing normal harvesting operations by utilizing nonmerchantable residual material on the site.

The need to create MFL yield tax information for woody biomass harvesting based on actual timber sale data is necessary and should be developed over a period of years. WWOA supports a 5-year moratorium on charging yield tax for woody biomass harvested while the data is being collected. Thank you for considering our request to review the implications of biomass harvesting on the MFL yield tax.

Sincerely,

*Nancy C. Bozek*

Nancy C. Bozek  
Executive Director

## Biomass Residual Guideline Relationships to Forest Certification Requirements

During 2007 certification audits of Wisconsin State Forests 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. Scientific Certification Systems cited a Forest Stewardship Council standard that harvests shall "mimic natural disturbance mechanisms". The auditors expressed a concern that loggers harvesting "fuel rods" (mostly top wood or fine woody material <4") for biomass could be interfering with natural processes and deplete soil nutrients. They recognized that regional interest in developing bio-energy plants could have a dramatic ecological impact as demand for fuel rods and other small-diameter woody material increases.

Certification reviews in 2008 checked on guideline development progress, and DNR pointed to the collaborative effort initiated by the Wisconsin Council on Forestry. The audit report issued for DNR State Lands recertification applauded the broad stakeholder effort but also cautioned the Department that adoption of biomass residual guidelines for DNR and County Forest lands is mandatory even if the Council process were to fail. A Department directive would be expected to unilaterally apply the draft standards (or other alternative) to public lands in time for the 2009 exams.

DNR's certification auditors will be looking for closure of the biomass CAR in the 2009 reviews that begin in August. Other certified landowners in the state, including forest industry and MFL owners, will be facing similar requirements to retain certification next year. Both FSC and SFI Standard revisions currently being proposed explicitly require landowners to have biomass residual policies. If the Council does not reach consensus on a statewide implementation policy, then each of the state's certified landowners would need to develop their own policies to conform to forest certification indicators. It would, however, be much less confusing to have a single statewide policy rather than inconsistent biomass policies established by individual forest owners.

-----  
Paul Pingrey  
March 5, 2009

**Wisconsin Certified Acres - January 20, 2009**

	Certification Standard				Tree Farm - Traditional 3rd Party Certified (PEFC)
	FSC Only	Dual FSC/SFI	SFI Only	Dual ATFS/FSC	
Wisconsin State Forests (DNR)		517,734			
DNR Lands (Parks, Wildlife Areas, Natural Areas, etc.)		1,023,453	57,225		
Wisconsin County Forests (DNR)	165,958	1,464,167	723,772		
Wisconsin Managed Forest Law Group (DNR)				2,239,205	
Plum Creek			342,096		
Stora Enso		5,411			
Community Forestry Resources Center - IATP	2,690				
Potlatch	76,000				
Menominee Tribal Enterprises	220,000				
CF/FIA Holding, LLC	62,945				
Traditional (Non-MFL Group) Tree Farms					194,427
<b>Total by Standard</b>	<b>527,594</b>	<b>3,010,765</b>	<b>1,123,093</b>	<b>2,239,205</b>	<b>194,427</b>

<b>Total WI Certified Acres (All Standards - no double counting)</b>	<b>7,095,083</b>
<b>Percent of WI Forestland Certified (All Standards)</b>	<b>45.01%</b>
<b>FSC Certified Acres</b>	<b>5,777,563</b>
<b>SFI Certified Acres</b>	<b>4,133,858</b>
<b>ATFS (PEFC) Certified Acres</b>	<b>2,433,632</b>

	Date First Certified	2009 Acreage Certified
<b>WI DNR Program</b>		
DNR - State Forests (FSC/SFI)	03-May-2004	517,734
DNR - County Forests (FSC/SFI varies by county)	11-Mar-2005	2,353,897
Managed Forest Law (ATFS)	03-Jun-2005	2,239,205
Managed Forest Law (FSC)	04-Dec-2008	2,239,205
DNR State Parks & Wildlife Areas (FSC/SFI)	04-Jan-2009	1,080,678

Prepared 01/20/2009  
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