

Advisory Committee for Woody Biomass Harvesting Guidelines for Forest Lands

April 29, 2008

Small Group Discussion

Topic: Water Quality & Physical Properties of Soil

This document contains a summary of the comments received during small group discussions at the April 29, 2008 Advisory Committee Meeting for Woody Biomass Harvesting Guidelines for Forest Lands. Both written and oral comments are summarized and responses are provided, as appropriate. Similar comments have combined to avoid duplication.

General Comments

- Comment: How do you balance preserving soil cover and the need for soil scarification to encourage regeneration?
- Response: Site preparation methods, such as soil scarification, are recognized sound forestry practices and would not be prohibited by biomass harvesting guidelines.
- Comment: Bolewood is defined in the guidelines as up to 4 inch diameter inside bark (DIB). Why was this standard chosen? Often this diameter is set by market needs.
- Response: The 4-inch DIB standard is found in the standard timber sale contract used on public lands in Wisconsin. MN allows utilization of down to 3 inches diameter outside bark (DOB) for cordwood, 6 inches for conifer, aspen, balm of Gilead and birch sawtimber and 10 inches for other hardwood sawtimber. We will consider this as we develop future drafts of the guidelines.
- Comment: How do the Biomass Harvesting Guidelines mesh with other guidelines, like the BMPs for Water Quality?
- Response: Other guidelines, such as the BMPs for Water Quality, would still need to be followed. If conflicts exist, the Biomass Harvesting Guidelines should clarify how to address conflicts.

Specific Guideline Comments

3A – Retain 1/3 of harvested FWD on site. If possible, leave the material well-distributed throughout the site.

- Comment: Using slash to armor trails and prevent soil compaction/rutting is not mentioned in the guidelines. How is the use of this practice affected by the requirements of 3A?
- Response: Using slash to armor trails is consistent with the goals of these

guidelines. Clarification on how to achieve this guideline under different scenarios, such as this one, will be needed in the final guidelines to assist in implementation.

Comment: Rather than leaving 1/3 of the harvested FWD on-site, is there a better way of determining what should be left? Perhaps considering what should be there for FWD as a starting point.

Response: We will look into other methods of determining how much FWD should be on-site and what should be left after a biomass harvest.

6A – Roads and landings should not occupy more than 3% of the harvest area. Roads, landings and skid trails should not occupy more than 15% of the harvest area.

Comment: Where does the 3% cap for roads and landings come from? Depending on how biomass harvests are structured, more land may be needed for landings than in traditional harvests.

Response: The 3% cap is found in MN's Forest Management Guidelines and in their Biomass Harvesting Guidelines. We will ask MN if the 3% cap is typically being met or exceeded during FMG monitoring. We will also review timber sale information collected on 30 state land sales in 2006 to see if the 3% cap is realistic.

Comment: Can the 3% cap be exceeded if the road or landing is rehabilitated?

Response: We will consider this suggestion in developing future drafts of the guidelines.

6B – Do not harvest woody biomass (over and above bolewood utilization) on shallow soils where bedrock is within 20 inches of the surface.

Comment: How does one determine if there is bedrock within 20 inches of the soil surface?

Response: The guidelines would include maps or a listing of soil types to identify where this guideline would apply.

Comment: In the southwest part of the state, the 20-inch guideline should be fairly easy to administer because of the flat nature of the bedrock; however, in other parts of the state, the bedrock may be rolling and the distance to soil surface may vary quite a bit. How would the guidelines be used when there is great variability in the depth of the soil?

Response: As we are developing the maps or listings to include in the guidelines, we will consider how to best address this type of situation.

9B – Do not harvest woody biomass (over and above bolewood utilization) on:

- Erosion prone sites
- 35 feet of the bank of a dry wash
- 35 feet of the ordinary high water mark (OHWM) of non-navigable streams
- 35 feet of the OHWM of navigable intermittent streams
- 100 feet of the OHWM of navigable perennial streams

- 100 feet of the OHWM of navigable lakes
- 100 feet of wetland borders

Comment: The BMPs do not require a RMZ around wetlands. Why do the biomass harvesting guidelines?

Response: This draft of the guidelines is based on MN's guidelines which require a RMZ and filter strips around wetlands, unlike Wisconsin's BMPs. MN's guidelines have a variable width of 50 feet to 200 feet around wetlands. WI's draft guidelines used 100 feet to be consistent with WI's other RMZs. We will consider this comment as we develop future drafts of the guidelines.