



**DEPARTMENT OF
NATURAL RESOURCES**

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April 25, 2023

TO: Forest Practices Board

FROM: Marc Engel, Senior Policy Planner, Forest Regulation

SUBJECT: Forest Practices Board Manual Section 21, *Guidelines for Alternate Plans*

The Board approved the TFW Policy consensus recommendations to address small forest landowner alternate plans and the Board Chair directed¹ staff to convene a stakeholder workgroup to amend Forest Practices Board Manual Section 21, *Guidelines for Alternate Plans*.

Following the recommendations, DNR approached the TFW Policy caucuses in December 2022 to recruit stakeholders familiar with the alternate plan process and who are experienced with small forest landowner alternate plan field reviews. DNR completed recruitment and assembled the BM Section 21 stakeholder group in early March 2023. The stakeholder group has 16 participants including 4 representatives from WFFA and DNR (including 2 DNR Region field foresters), 3 representatives from the tribes, 2 from industrial landowners, and 1 representative each from the departments of ecology, fish and wildlife, and the counties.

In early March, DNR and WFFA began developing amendments of BM Section 21 to present to the stakeholder workgroup. The intent of these amendments were to address and include all of the Board approved recommendations and key points of agreement into the manual section to provide a “straw dog” document for stakeholder review, and in an effort to expedite the timeline to develop an amended manual section to present to the Board for review and approval.

DNR and WFFA worked on multiple drafts of BM Section 21, and on March 22nd agreed to send BM Section 21 version 5 to the stakeholder workgroup in advance of their first meeting on March 31st. As of April 25th, the stakeholder group has met three times: on March 31st, and on April 12th and 18th with an additional meeting scheduled for April 27th. All stakeholders have been actively involved in the meeting discussions and development of BM Section 21 with each meeting producing a new version of the manual section. Version 9 of the manual section will be reviewed and amended at the April 27th workgroup meeting.

¹ The Board passed the following motion at their November 10, 2023 regular meeting: “Kelly McLain moved the Forest Practices Board approve TFW Policy Committee’s consensus recommendation to address small forest landowner alternate plans, and for the Board to affirm the key points of agreement. She further moved that the Board request the Board chair to direct DNR staff to convene a stakeholder group to amend Board Manual Section 21 following the process outlined in WAC 222-12-090.”

A summary of the amendments to BM Section 21 under development include:

- Consolidating existing board manual alternate plan guidance into a new part devoted to technical guidance for small forest landowners;
- Providing information on the areas of the alternate plan (AP) process that small forest landowners can clearly participate in and benefit economically from;
- Providing an AP process for small forest landowners to develop and implement a harvest plan within the rule identified Riparian Management Zone (RMZ), which is a low impact to riparian functions;
- Developing “criteria to assist DNR in determining whether a small forest landowners alternate plan qualifies as a low impact alternate plan”. WAC 222-12-0403(5); and,
- Developing examples for harvest opportunity to be considered within the RMZ for small forest landowners and includes information on situations where the design of the AP and field review can be more successful.

The workgroup is also focused on incorporating the key points of interest to assure Board Manual Section 21:

- Is prepared in a manner which is not confusing or intimidating to small forest landowners;
- Acknowledges small forest landowners are impacted more by regulation than other landowners who harvest timber in Washington State;
- Provides guidance on how to access the DNR Small Forest Landowner Office for online assistance and how to contact DNR Regions for field assistance. WAC 222-12-0402; and
- Re-inserts the previous Board-approved “Imminent Mortality” guidance.

DNR and the stakeholders will discuss at the April 27th workgroup meeting remaining work to be completed in order to bring Board Manual Section 21 to the Board for approval. The workgroup still needs to develop examples of alternate plans, information boxes to add clarity and understanding to essential concepts and alternate plan design, and illustrations to assist small forest landowners develop and implement alternate plans.

DNR will provide a summary of the development of BM Section 21 at the May meeting. If you have any questions please contact Marc Engel at 360 628-1107 or marc.engel@dnr.wa.gov.

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