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NRCS-Michigan Forest Management Plan (106) Review Guidance

This guidance is being provided to NRCS field staff in Michigan to provide clarification on some of the required Forest Management Plan (FMP) criteria. It may be updated from time to time as FMP requirements change or as additional guidance is deemed necessary.

Background

Forest Management Plans are one of several Conservation Activity Plans offered through the Environmental Quality Incentives Program (EQIP). Demand for FMPs has increased significantly each year since FMPs were first offered in 2009. In Fiscal Year 2013, over 450 FMPs were contracted, representing over \$500,000 in financial assistance.

FMPs are prepared by Technical Service Providers (TSPs) – private-sector consulting foresters who have been certified by NRCS to prepare FMPs. As of May, 2014, there are 40 certified TSPs for the FMP category. With the exception of quality assurance reviews that are done of TSPs every three years by the NRCS State Forester, FMPs undergo a “completeness review” at the field office level.

The primary tool used for reviewing FMPs is the Forest Management Plan Criteria and Checklist. This checklist was developed for use in Michigan and is adapted from the national NRCS Forest Management Plan Criteria. Both of these documents can be found in Section III of the electronic Field Office Technical Guide (eFOTG). Additional plan reviewing tools available include the National Planning Procedures Handbook (NPPH) (available at <http://directives.sc.egov.usda.gov/>), National and State Resource Concerns and Planning Criteria (sec. III of eFOTG), and NRCS-MI Conservation Practice Standards (section IV of eFOTG).

Given the large number of FMPs being written for landowners, and the large number of FMP reviewers in NRCS field offices, there are naturally some varied interpretations of what is expected to be included in an FMP. This document aims to provide clarification for some of the FMP criteria.

Plan Reviewers

Each field office is responsible for reviewing FMPs that are contracted through their office. The District Conservationist is ultimately the responsible individual in each office, but he or she may rely on other NRCS staff and partner staff, including Conservation District Foresters, to assist with reviews. It is required that Certified Conservation Planners be used to sign off on FMPs. Since NRCS is responsible for the certification of the FMP for EQIP, only NRCS staff should complete and initial the checklist and issue plan review letters, even if Conservation District staff assists with the review.

These field office reviews are intended to be a completeness review, rather than a technical review. If, however, during the plan review, a reviewer has concerns with the plan contents that are of a technical nature (silvicultural, ecological, etc.), they are encouraged to inquire with the Area Staff, State Forester or other ECS staff as appropriate for further assistance.

General Guidance on FMP Contents

Planning Procedure

An FMP is a one type of conservation plan. Guidance on conservation planning can be found in the National Planning Procedures Handbook (available at <http://directives.sc.egov.usda.gov/>). An FMP is essentially documentation of steps 1 through 7 of the conservation planning process detailed in the NPPH. Steps 8 and 9, however, are not required for an FMP. Additional information on documentation requirements of these first 7 steps is provided below, as it relates to the FMP criteria.

A conservation plan is a “record of landowner decisions.” This is in contrast to other planning processes that may only provide recommendations to the client or a list of multiple conservation options. Because of this, it is expected that, as part of the planning process, TSPs discuss treatment options with the client, including advantages and disadvantages of various treatments and help them to select the treatment option that best meets their needs, and is within the means, financially and otherwise. Conservation Practices detailed in the FMP should be those that the landowner has selected to address their identified resource concerns.

Plan Format

There is no requirement to use any particular plan format or plan template for FMPs. However, the template that is available at http://www.nrcs.usda.gov/wps/portal/nrcs/detail/mi/technical/?cid=nrcs141p2_024578 was designed specifically to follow the FMP Checklist. TSPs are encouraged, but not required, to use it.

Plan Deliverables

As indicated in the FMP Criteria and Checklist, landowners must receive, at a minimum, a hard copy of the FMP and all maps. The servicing NRCS Field Office must receive both a hard copy and an electronic copy. If, however, the District Conservationist, for reasons of efficiency or timeliness, deems it unnecessary to require a hardcopy from the TSPs, they can inform clients and TSPs that the electronic version is adequate.

Guidance on Select FMP Criteria

The following section provides some additional guidance on certain sections of the Forest Management Plan Criteria and Checklist. Not all required criteria are listed here.

3.e. Landowner objectives

Objectives, as defined by the NPPH, are quantitative or qualitative statements of desired future conditions as determined by the client. Objectives should be more specific than broad goal statements. For example, if wildlife habitat is a landowner goal, the objective statement should provide information about which species of wildlife the landowner is interested in. Likewise, objectives related to timber (or other forest products) production should include details about the commercial species of trees being managed for wood products.

4.b. Description of the forest/resource inventory methods used to develop the plan

FMPs are required to be based on a forest inventory conducted using generally accepted forestry inventory methods. Point sampling is the most common method used, but fixed-radius plot sampling or zig-zag transects could also be used. The FMP should contain, at a minimum, a description of the method used, the number of points or plots taken, and the type of data collected. There is not a specific number of points or plots required by NRCS, but TSPs are encouraged to follow the Society of American Foresters’ protocol for sampling (Wenger, K.F., ed. 1984).

Forestry Handbook, Second Edition. Society of American Foresters publication Number SAF 84-11. John Wiley and Sons, Inc. New York, NY).

5. Management Unit Descriptions

Several descriptors are required under this heading. As indicated in the Criteria and Checklist, if there is no variability among management units, a description may be provided for the property as a whole, eliminating the redundancy of describing the same condition for each land unit.

If a particular criteria does not apply at all to the property or to an individual management unit, it is expected that a statement to that effect be included in the FMP, e.g., “There are no roads and trails in unit 1,” rather than simply omitting it from the plan outright.

For many of the Criteria in this section, the level of detail provided will vary depending on the landowner’s objectives as well as the identified resource concerns. For example, if wildlife habitat improvement is identified as a landowner objective, it would be expected that the description of known fish and/or wildlife species, and fish and/or wildlife species habitat elements would be more detailed than for a client with no wildlife interest.

5.d. Common species by size class

If possible, TSPs should describe the vegetation in all strata of the forest, from large, overstory trees, down to tree seedlings, shrubs, and grassy and/or herbaceous vegetation. An exhaustive list is not required, but a few of the dominant species from each strata, and those species directly related to the landowner’s objectives, should be included at a minimum. It is up to the TSP to decide what classification method they want to use: they can describe trees by diameter range, general size class, etc., at their discretion.

It is acceptable for TSPs to omit the herbaceous and/or seedling information if the field work was conducted when snow cover prohibited their inventory. If this is the case, TSPs should be encouraged to include a note to this effect in the plan.

6.a. Documentation of identified resource concerns

Resource concerns are defined by the NPPH as an expected degradation of the soil, water, air, plant or animal resource base to the extent that the sustainability or intended use of the resource is impaired. Identification of current resource concerns is critical to the planning process. It is these resource concerns, coupled with landowner objectives, that justify the planned conservation practices detailed in the plan. NRCS recognizes 31 Resource Concerns. These are typically documented on the “Resource Considerations Field Inventory Guide Sheet,” which is an excerpt of the form CPA-52 (available at

http://www.nrcs.usda.gov/wps/portal/nrcs/detail/mi/technical/?cid=nrcs141p2_024578).

However, TSPs may opt to detail the resource concerns elsewhere in the plan narrative or an appendix. Regardless of the method chosen, TSPs are expected to use the NRCS-recognized Resource Concern names as shown in the Resource Considerations Field Inventory Guide Sheet.

Anticipated future resource concerns, however, do not need to be documented, although TSPs are encouraged to address them in the “Additional Management Considerations” section (see Section 9 below).

6.b. Resource assessment tools used and results of resource assessments

Closely related to item 6.a., this criterion is intended to explain how the TSPs determined something to be a resource concern and justifies the planned conservation practices, helping to ensure that federal funds are not being spent to install unnecessary conservation practices. A

good source of suggested assessment tools can be found in the National and State Resource Concerns and Planning Criteria (sec. III of eFOTG).

However, it should be noted that the NPPH clearly states that alternative assessment methods can be utilized and that planners can tailor the level of inventory detail to the complexity of the resource setting and the identified problems, opportunities, and objectives. The NPPH states that professional judgment must be exercised in determining which methods or combination of methods will be most appropriate and does allow for observation and deduction in addition to procedural assessment tools for many resource concerns (600.22). Regardless of the method used, TSPs must document how they determined that something is a resource concern, either in the Resource Consideration Guide Sheet, or elsewhere in the FMP narrative.

7. Desired Future Conditions

As indicated above, this is very closely related to Landowner Objectives. For FMPs, Desired Future Conditions are required for each management unit, and include measures of stocking and/or basal area, as well as species composition (described similarly to the current vegetation as discussed in 5.d.). If the landowner's objectives include wildlife and pollinator habitat and recreational values, a description of the desired future conditions as they relate to these resources should also be included.

8.d. Schedule for implementation

While NRCS requires that Planned Conservation Practices be scheduled by month and year, it should be noted that landowners are not obligated to implement the practices exactly as scheduled, even if landowners are subsequently enrolled in EQIP or another NRCS program to assist with their implementation. Rather, the schedule is simply the TSP's suggested best installation time, given planning time requirements, weather and site constraints, etc. TSPs are encouraged to schedule a practice for a specific month and year, but to also provide a range of acceptable times, e.g., to avoid risk of oak wilt infection, or to minimize rutting and compaction, etc.

8.e. Necessary specifications and/or job sheets for each practice

Site-specific installation details are an extremely important component of any conservation plan. Broad recommendations and referrals to or inclusions of generic references (including the conservation practice standard itself) are not adequate.

For each planned conservation practice that is included in an FMP, it is expected that plan reviewers will review the plan against the "Plans and Specifications" section of the Conservation Practice Standard. If a particular documentation requirement for a conservation practice does not apply to the particular installation, a note to that effect should be included, e.g., "No site preparation will be required prior to installation," or "no additional mitigation measures are necessary."

Exception

Forest Trails and Landings (655) is different than other forestry practices in that it is often designed and installed in conjunction with planning a commercial timber harvest. In many cases, it is impractical to fully design a trail and landing installation much in advance of the harvest (when the plan is being developed). So, some discretion must be used. For this practice, estimates of extent (acres), installation dates, and general guidance about erosion control methods, etc., may be adequate.

9. Additional Management Considerations

This section is included in a plan to provide information on three types of activities:

- a. Likely future conservation practices that will be scheduled several years into the future to address an anticipated future resource concern.
- b. Conservation Practices that are beyond the TSP's knowledge, skills, and abilities to adequately plan, e.g., engineering practices.
- c. Management activities for which there is not an NRCS conservation practice available.

If possible for these types of practices and activities, the TSP should detail the management unit on which the practice will take place, the practice name and code, an estimate of the amount to be applied, and an estimated schedule for implementation. Full practice specifications are not required for these practices.

Conclusion

It is important that NRCS staff is providing a cohesive message to both our clientele as well as our TSP partners, and that the level of scrutiny of plans is consistent across county lines. It is expected that all criteria required as per the "Forest Management Plan Criteria and Checklist" can be accounted for in all CAP-Forest Management Plans.

To aid plan reviewers in delivering a consistent message, an FMP review letter template has been developed, and placed on the Michigan SharePoint site in the Ecological Sciences>Shared Documents>Forestry folder. The letter is a compilation of the most common recurring deficiencies found in CAP-Forest Management Plans and suggested language for relaying these deficiencies to customers and TSPs. Plan reviewers may copy any applicable sections into review letters being sent to the customers.

Please remember that even if another NRCS or Conservation District employee aids in plan reviews, the District Conservationist should be the person who ultimately issues the review checklist and letter.

