

Natural Resources Management Policy 32

SUBJECT: Firewood Restriction for Rock Island District Recreation Areas and Other Project Lands

1. Purpose: To reduce the risk of accidental introduction of the emerald ash borer (*Agrilus planipennis*) (EAB), gypsy moth, and other damaging forest pests into Rock Island District recreation areas and forests through public education, firewood restrictions, and interagency cooperation.

2. History and Background: EAB is an exotic wood boring insect that was accidentally introduced into the Detroit area from Asia in the early 1990s. It was not discovered until 2002, after it had already spread though most of the lower peninsula of Michigan. In 2009 it was established in Ohio, Indiana, and Ontario, and introductions have been found in Pennsylvania, West Virginia, Maryland, Illinois, Wisconsin, and Missouri. EAB larvae attack and kill ash trees by tunneling into the bark and destroying the tree's circulatory system. The insect has damaged or killed millions of ash trees in affected States. It is extremely important not to move ash firewood out of areas of EAB infestation. The transportation of infested firewood can quickly spread the infestation to new areas. Firewood can also be a vector for other forest pests including gypsy moth, oak wilt, Asian long-horned beetle, and the sirex wood wasp to name a few.

a. To slow the spread of EAB in particular, the Animal and Plant Health Inspection Service (APHIS) instituted federal quarantines on firewood and other regulated articles in eight states including all of Illinois, Indiana, and Ohio, along with portions of Michigan, Maryland, Missouri, Wisconsin, and Pennsylvania. Intra-state quarantines exist in Illinois, Missouri, and Wisconsin to name a few. Regulated articles include all firewood from hardwood species (such as ash, maple, or oak for example), ash nursery stock, green ash lumber, and other forms of ash. All hardwood firewood is regulated since determining the species of firewood is problematic once it is cut and/or split.

b. All native ash species can be killed by EAB including white, blue, black, and green ash.

c. Currently, several states are restricting firewood at their state managed campgrounds including Iowa, Illinois, and Wisconsin. Iowa is restricting firewood from quarantined areas and asking the public to burn restricted firewood as soon as possible. Illinois is prohibiting firewood from quarantined areas and counties adjacent to the quarantined boundary. Wisconsin is prohibiting bringing firewood to campgrounds from quarantined areas, firewood originating from out-of-state, and firewood from further than 50 miles.

3. Policy: To reduce the potential for firewood transported pest infestations, it is the policy of the Rock Island District to:

a. Provide public information and education through visitor contacts, signage, interpretive displays, programs, brochures, and other methods. The Corps will convey the message to the public regarding:

- (1) the dangers of EAB and other forest pests;
- (2) the benefits of local purchase and use of firewood; and
- (3) the reasons for restricting firewood transport.

b. Restrict firewood. Under the authority of Title 36 Rules and Regulations, Section 327.12 (a), the District Commander hereby establishes a restriction on Rock Island District project lands that prohibits the possession, transportation, use, or storage of all firewood that:

(1) Originated from out-of-state; or

(2) Was transported in violation of a state or federal firewood quarantine.

This restriction will be implemented by Corps staff using the lowest level of enforcement necessary, as per ER 1130-2-550, Section 6-2. f. and through coordination with State and Federal agencies involved in firewood quarantines. Exception to this restriction: firewood officially certified as pest-free.

c. Cooperate with other agencies per ER 1130-2-540, Chapter 4 ,Forest Service Pest Suppression Assistance at Civil Works Water Resources Development Projects. The USDA Animal and Plant Health Inspection Service (APHIS) and the states also have existing mandates and jurisdictions to respond to pest infestations and quarantines. Partnering with these agencies for appropriate responses to firewood quarantine violations would increase overall effectiveness of the program. In addition, Corps project staff will be responsive and supportive of requests from the USDA or their partners to conduct forest pest monitoring activities or follow-up control measures on project lands that are not in conflict with Corps missions.

d. Respond to future infestations within or near Corps parks. When future infestations are found, firewood restrictions at individual Corps sites or Projects may be adjusted to meet the current situation. An infestation found nearby a campground is one example of a situation that may require a change in firewood restriction. This may warrant restricting all firewood from entering the campground except for wood available through a designated certified vendor.

4. Implementation: To assist in the implementation of this policy, a number of specific management actions have been identified in Appendix B. This list is not inclusive. However, it is recommended that as many of these actions are taken on project lands as staff and budget resources allow.

5. In summary, the forests on and around Corps lands are an important natural resource for the States and the Nation. In affected areas, the Federal and State governments have spent millions of dollars on eradication and control of EAB and other forest pests. This district policy is a proactive measure that will help reduce or delay the risk of similar financial and ecological impacts on Corps and surrounding lands.

APPENDIX A

REFERENCES AND DEFINITIONS

1. References

- a. Wisconsin Administrative Code, Department of Natural Resources, Chapter NR 45.04(1)(g).
- b. 7 CFR 301.53 (USDA Animal and Plant Health Inspection Service quarantine)
- c. Title 36, Chapter III, Part 327, Section 327.12 (a) Restrictions
- d. ER 1130-2-540, Project Operations, Environmental Stewardship Operations and Maintenance Guidance and Procedures, Chapter 2, Section 2-2. c. (7), Natural Resources Protection
- e. ER 1130-2-550, Project Operations, Recreation Operations and Maintenance Procedures, Chapter 6, Section 6-2. f, Title 36 Citation Authority
- f. Title 36, Chapter III, Part 327, Section 327.12 (a) Restrictions: The District Commander may establish and post a schedule of visiting hours and/or restrictions on the public use of a project or portion of a project. The District Commander may close or restrict the use of a project or portion of a project when necessitated by reason of public health, public safety, maintenance, resource protection or other reasons in the public interest. Entering or using a project in a manner that is contrary to the schedule of visiting hours, closures or restrictions is prohibited.
- g. Illinois Department of Natural Resources Administrative Code, 17ILL.ADMCODE CH.I, SEC 110.60 d).
- h. Wisconsin Administrative Code at ATCP 21.17
- i. Missouri Revised Statutes, Chapter 263, Insect Pests and Weeds.

2. Definitions

- a. FIREWOOD means any part or portion of a tree that has been cut and removed from its original location and is to be burned as fuel for heating, cooking, or aesthetic enjoyment in open pit, grill, fireplace or stove.
- b. OFFICIALLY APPROVED OR CERTIFIED PEST-FREE FIREWOOD means firewood from a vendor whose product has been approved or certified by the USDA or appropriate State agency as being pest free. The vendor application process requires firewood dealers to indicate the firewood origin or the treatment process they used to eliminate invasive insects and diseases in their firewood. The treatment processes include heat treatment or kiln-drying, debarking, fumigation, 2 or more years of storage or another manner approved by the State. States may have an approved firewood vendor list.
- c. QUARANTINE by the U.S. Department of Agriculture, Animal and Plant Health Inspection Service (APHIS) or state Department of Agriculture restricts movement of regulated articles.

d. A REGULATED ARTICLE is defined as:

(1) emerald ash borer;

(2) firewood of all hardwood species, such as, but not limited to; ash, oak, maple and hickory;

(3) nursery stock and green lumber of ash;

(4) any other ash material living, dead, cut or fallen including logs, stumps, roots, branches, as well as composted and uncomposted chips of the genus *Fraxinus*;

(5) In addition, any other article, product or means of conveyance not listed above may be designated as a regulated article if a USDA or state Department of Agriculture inspector determines that it presents a risk of spreading EAB.

APPENDIX B

1. Implementation: The following management actions will be considered for implementation at recreation areas and other Corps lands in the Rock Island District.

A. Public Information and Education

(1) Place a 'firewood alert' message on the web-based reservation system RECREATION.GOV for Rock Island District recreation areas.

(a) A suggested format that could be placed under the 'Alerts and Important Information' section of the campground details webpage is as follows: Firewood Alert -When camping or picnicking at this recreation area, purchase your firewood from a local vendor. Don't bring firewood from home. To help prevent the spread of the Emerald ash borer and other threats to forest health, the Rock Island District Corps of Engineers is prohibiting firewood if it originates from out-of-state or from a quarantined county.

(b) Include a statement about availability of approved pest-free firewood in the recreation area.

(c) Add a similar message to the reservation information voice messages at the parks.

(2) Where feasible, mail postcards or otherwise follow up with campers who made reservations prior to this policy being in effect.

(3) Place firewood information signs or posters throughout campgrounds, picnic areas, boat landings and other appropriate locations. Information at boat landings will help address firewood use at undeveloped areas.

(4) Make firewood restriction policy and informational handouts available to all campers at check-in as well as at kiosks and brochure racks.

(5) Use the Corps Interpretive Services and Outreach Program (ISOP) to educate recreation visitors and the public about the firewood restriction policy and potential impacts from EAB and other firewood borne forest pests.

(6) Familiarize appropriate current lessees with this District policy. Real Estate agreements for commercial sale of firewood on Corps lands shall stipulate vendor compliance with all state and USDA/APHIS firewood quarantine restrictions. Contracts and bid notices for Corps timber /firewood sales from quarantined areas shall inform the interested parties on the limitations of transporting regulated articles.

(a) During visitor contacts, we should encourage the public to use only local firewood and burn it all during their visit. If the site is within a quarantined area, the transport of firewood out of that quarantine is against state and/or federal rules, regardless of where the firewood came from originally.

B. Interagency Cooperation

(1) Coordinate with USDA, APHIS and/or the state department of agriculture(s) on violations of federal or state firewood quarantines, in particular, the State Entomologist and USDA State Plant Health Director. Projects and the District should also continue communications with these agencies to ensure understanding of roles regarding quarantined firewood found in Corps areas. We should also communicate our Title 36 capabilities since we are not full law enforcement officers.

(2) Coordinate these actions with adjacent Corps of Engineers districts.

(3) Coordinate these actions with local offices of the U.S. Fish and Wildlife Service and State departments of natural resources who have management responsibilities on Corps lands.

(4) Cooperate with the U.S. Forest Service, APHIS, and/or state departments of agriculture regarding access requests for EAB monitoring activities.

(5) Respond to suspected detections of EAB at Corps project lands by contacting the appropriate State department of agriculture.

(6) Be vigilant in watching for EAB signs and symptoms on ash trees. When pruning or cutting ash trees for any reason, peel some of the bark back on the cut pieces, which are larger than two inches in diameter, to check for EAB.

C. Recommended Firewood Handling Procedures: The following are the recommended procedures for enforcing firewood restrictions at recreation areas and other Corps lands in the Rock Island District.

(1) What firewood is allowed under this particular restriction?

(a) In-state firewood that has not been transported in violation of state or federal firewood quarantine.

(b) USDA certified firewood is also allowed: Bundled firewood purchased in-state at a commercial store (even from a quarantined county) can be brought in if each bundle of firewood exhibits a USDA Stamp indicating the firewood vendor has a compliance agreement with USDA. (See example of compliance agreement stamp at right.) The agreement will have a unique compliance agreement number at the bottom (for example IL-012) that will be different for each vendor, but the rest of the stamp is standard. PPQ Form 540 from the USDA also certifies compliance and would be acceptable.



(c) Firewood from state and/or federally certified vendors. Firewood vendors at Corps facilities should be on the respective state's current pest-free certified firewood vendor list if applicable and/or be USDA certified. Rangers may be able to provide campers information on local vendors who are also on this list. Information or current lists are available at:

- Wisconsin -[http://datcp.state.wi.us/press release/result.jsp?prid=1983](http://datcp.state.wi.us/press%20release/result.jsp?prid=1983)

- Illinois – <http://www.agr.state.il.us/eab/>
- Missouri – no current restrictions on in-state firewood vendors
- Iowa –no current restrictions on in-state firewood vendors

(e) Untreated dimensional lumber such as scrap 2x4s.

(2) Firewood that is not allowed

(a) Out-of-state firewood.

(b) All firewood transported in violation of a state or federal firewood quarantine..

(3) Actions to respond to the discovery of restricted firewood that hasn't violated a quarantine order:

(a) Ask campers to immediately burn restricted firewood: Use discretion to provide a time period to the camper on burning the restricted firewood (not to exceed 24 hours).

(b) Camping privileges: If a camper brings out-of-state firewood that isn't from a quarantine area and doesn't agree to burn the firewood immediately, they can keep the firewood and camp off Corps lands. Refunds of camping fees are at the Operations Manager's discretion.

(c) Warnings and Citations: Verbal or written warnings should be used for the majority of discoveries. If a citation is deemed necessary it should be written, under Title 36, Chapter III, Part 327, Section 327.12 (a) Restrictions.

(4) Actions to respond to firewood in violation of state or federal quarantines:

(a) Coordinate with APHIS and/or the appropriate state department on violations involving federal or state quarantine respectively. These agencies also have enforcement capabilities. Refer to www.emeraldashborer.info for contact information.

(b) Storage and disposal of firewood from quarantined areas: If the coordinating agency wishes to inspect and/or collect the firewood, ask the visitor to voluntarily load and seal the firewood in government provided contractor grade plastic bag(s). The coordinating agency may also handle the disposal of the firewood after they inspect it and complete their investigation. If disposal by the Corps is required and it can't be burned immediately, it should be bagged and burned or chipped at the earliest possible time. Chipping should create pieces that are less than 1 inch in size in two dimensions.

(c) If campers will not agree to voluntarily surrender their firewood from a quarantined area, contact APHIS and/or state agency as appropriate. The Corps does not have authority to seize firewood.

(d) Warnings and Citations: Coordinating agencies may be interested in following up on individual firewood quarantine violations. The District and Project should remain aware of the roles of each agency and strategy for the mutual enforcement of violations. If a Corps citation is deemed necessary given potential enforcement actions by cooperating agencies, it should be written, under Title 36, Chapter III, Part 327, Section 327.12 (a) Restrictions.

D. Establish a District point of contact to facilitate coordination with other agencies.

2. Resources: The following is a list of State and Federal websites with a wide range of information on EAB and firewood issues, including links to brochures, posters, quarantine maps, and aids for identifying ash firewood and the various life stages of EAB.

a. Multi-State effort between Michigan, Illinois, Indiana, Maryland, Ohio, Pennsylvania and Wisconsin to bring the latest information about EAB <http://www.emeraldashborer.info/>

b. Wisconsin Department of Natural Resources-
<http://www.dnr.state.wi.us/org/land/Forestry/FH/Ash/>

c. Wisconsin Department of Agriculture, Trade and Consumer Protection-
<http://www.datcp.state.wi.us/arm/environment/insects/emerald-ashborer/index.jsp>

d. U.S.D.A. Animal and Plant Health Inspection Service-
http://www.aphis.usda.gov/plant_health/plant_pest_info/emerald_ash_b/index.shtml

e. U.S. Forest Service - <http://www.na.fs.fed.us/fhp/eab/>

f. Iowa Department of Natural Resources- <http://www.iowadnr.com/forestry/health.html>

g. Illinois Department of Agriculture- www.illinoiseab.com/

h. Missouri Department of Conservation- <http://mdc.mo.gov/forest/health/ashborer/>