Operations Plan Comments from Internal Staff and External Partners

1_____
During the town hall meeting on the 7th, a question was brought up toward the end about technicians and foresters and what roll they will play in the future. It sounded almost as if there might possibly be somewhat of a change for technicians. If this happens, would this occur as our new PD's are written? Would current technicians be grandfathered in as far as how much forestry work we do?

I am asking because, I really enjoy the forestry aspect of my job. I especially like the freedom and creativity involved in having my own assigned county compartments and setting up timber sales in them. I even enjoyed writing MFL plans back when I used to do them. I also liked talking with landowners about their property and explaining to them how the program works, what they had for trees, and how those trees regenerate so that a timber sale was not so scary for them. I also liked working on school forest and state lands when I did them.

2_____
First of all let me just say that I'm on board with this plan and I'd like to apologize for the length of my questions. I firmly believe that if you are going to do something you should do it well, especially in this case we owe it to ourselves, the people of Wisconsin, and the natural resources we over see. My line of questioning relates to training.

Has there been talk about further integration of the training and qualifications that Technicians and Foresters receive? I feel that under the premise of 7 day staffing, the passing of LE credentials for Rangers and Foresters assuming various fire control duties, there will be much more integration on the ground of the duties that were traditionally put under one group. In many cases due to vacancies and absences of Rangers this is already the case. My main area of concern is with the complexities of making public contacts while handling burning complaints. Currently Rangers have received training in that area while attending LE academy and passed a lot of that information on to others at their home stations.

Will there be a plan to incorporate some of the training traditionally received at LE academy to Technicians and non-credentialed foresters? I feel that this is important both for the safety of the individual and for good customer service.

Along with that has there been consideration for training and maintaining all foresters with fire control responsibilities on heavy units? I ask this once again under the premises of seven day staffing not knowing fully the structure of it. It seems to me that the situation could arise where on a Ranger's day off they could be called in to help fire staff. If a technician were staffing the 4x4 and on a fire the only thing left to staff may be a heavy unit.

I am glad to work with such a diverse multi talented group of people and no matter the nature of my position I'll continue to operate with the motto that "The trees will always grow and the fire will always burn, therefore the job that I love will always exist in some form or another".

#3_____
On Tuesday's Town Hall Meeting, it was asked - Won't the "Specialty Programs" become more invisible since there won't be a tie to the district and basically no one representing them in the districts? That question was not answered, the answer given kind of made a full circle around the question without answering it.

#4_____
Law enforcement - I am unclear about the flexibility associated with LE position. From my perspective, other than medium workload involved with snowmobiling and x-country skiing, both LE and operational activities drop for some State Forest LE staff during the winter months. So if LE positions are targeted 100% LE without the

flexibility for being involved in recreation/ops or field forestry, finding priority activities for them to be involved in will be difficult. The effectiveness of an LE position during the winter months (6-7months) needs to be reviewed. On the positive side, having the availability of 3 LE officers to cover summer and hunting seasons is a major leap from 1 LE position we have had over the past 3 years.

Consider the possibility for a hybrid position to include field forestry activities and consider classification of Forester/Ranger rather than Ranger/Enforcement. This would allow additional flexibility during the winter months and assisting the Area both in fire control and forestry.

The elimination of the VSA position raises the most concern. This position is essentially the business manager for the property. Consequences of loosing it will impact us severely across all state forest programs. Efficiency of the forestry, recreation, operations, land control, and law enforcement programs will be decreased as these duties will be shifted. Foresters will be recording tickets, sending bills, LE will be writing handicap permits and counting money, making deposits at the bank, staff will be entering truck books, etc. This operational change may work within a smaller program; however for larger ones you reach a level of capacity that you can no longer justify it. This was recognized 15 years ago and since then the program has tripled in receipts associated with forestry and recreation. In any business there are a number of duties that keep the wheels turning and require less technical skills but still require a substantial amount of time. From a fiscal point it is not a wise business decision to require someone making $25-$30/hr as compared to $15/hr to do the same work. This would subsequently be the scenario. I am not debating this less technical work could not be completed by others, but it will come at a higher price and loss of productivity. Our VSA handles all the business administrative duties associated with running the forest along with the customer service activities through-out the year. Customer service has been stressed and we take it very serious, as we should. With our present VSA FTE we are able to stay open 4 days/wk during the summer and 3 days/wk during the winter months. I expect with this proposed change customer service will be reduced. An LTE may be able to assist, however their understanding of the programs and efficiencies will be limited along salaries being similar.

Consider: Maintaining VSA positions on the state forests as this position assists in a wide variety of lower technical duties increasing the efficiency and cost effectiveness of professional staff. If not done productivity and customer service will decrease across the programs and will make it very difficult in not impossible to meet goals. Open hours of the headquarters will need to be reduced. Second option to consider is to shift additional duties to position presently under other staff within the area to justify position.

Recreation/Operations, I have not seen the operational or recreational data associated with this State Forests. I am hoping some of the unique aspects of the state forests were not missed. The access infrastructure of the state forest is similar to most townships. There are miles of maintained trails, miles of developed roads, parking areas, river campsites and miles of rivers and lakes. All of this leads to a heavy workload when it comes to maintenance that involves the use of heavy equipment. When it is cost effective, work is contracted out, but in most cases it is more cost effective if we complete the work with our force account. The concern I have was this workload identified and hours attached and how much was it. Cuts in forest techs will have an impact. We normally get 400-500 hrs in heavy equipment assistance per year from area staff. Consider: If it was not done, re-evaluate workload associated with maintenance of this state forest infrastructure.

Implementation of the re-alignment will take time. Existing personnel are not always capable of achieving goals we anticipate them doing. This may sound simple but could be a major stumbling block in meeting goals. Some individuals will grasp the change and run with it. However there is a percentage out there that may not be capable of what are expectations are. This is reality. We will try to work with them however sometimes it just doesn't work. Subsequently efficiency and productivity will suffer. Additional time will be required by our professional staff to assure work is being completed satisfactorily which creates a sink hole of hours.

Consider: Include in your operational time allotments a buffer 20-30% additional time that will be required as we transition into the new alignment. If we choose to ignore this we will struggle attempting to make this re-alignment work.

Thanks for all the effort you have put into this project, you are a true visionary and because of that we are way ahead of the pack when it comes to our future.

#5_____

Consolidated Law Enforcement Positions

Note – this comment is based on the assumption that these positions would be 100% LE. This was confirmed by my FLT member and by a peer's FLT member. Interestingly a third peer said their FLT member said this was not the case.

On the surface I like the idea of consolidated law enforcement, but as applied with staff being 100% LE it would ignore the seasonality of law enforcement needs, oversubscribes law enforcement compared to the actual workload, exacerbates an already existing problem of confusion on who these staff report to, and I believe violates the intent of the strategic direction

Recreational Law Enforcement occurs year round but the vast majority of it is concentrated from mid-May through Labor Day. During the rest of the year, with the exception of Deer season enforcement needs on properties are relatively low. This is shown in the shift assessment that was used for the state forest law enforcement program, and how hours of workload need were calculated for the strategic direction Recreation and Enforcement sub team.

As an example, from October through April 3, four shifts a week are needed to meet law enforcement goals on state forests. If the hybrid LE positions were utilized as designed they alone would meet the need for 7 months of the year with no additional shifts for the other credentialed assigned staff. The Ranger Enforcement fully dedicated to the property would not get enough hours in a year to maintain that classification, the ranger assistant property manager would not be able to remain competent to provide enforcement if they did not receive any shifts for seven months.

The reality is that under this model we would need to staff this person 5 days a week during the winter performing LE, I would need to assign my ranger enforcement on average 2 days a week and my ranger assistant property manager 1 day a week. That would add up to eight shifts when my true need is 3-4 shifts a week. The workload is not there for this level of enforcement, nor was it called for in the strategic direction.

Enforcement during the fire season is also a highly condensed time that enforcement occurs. Forester rangers provide very little time outside this window performing law enforcement.

This suggests these positions would be somewhat self-directed on where they would fill their time outside of these concentrated windows. A likely place this would occur may be timber theft monitoring. Yet nowhere in the strategic direction does it state that additional resources will be directed to this area. In fact during the Rec. and LE sub team deliberations no additional time for timber theft enforcement were included in the determination of workload as there was no intent statement that this area would be increased.

A better model, more fully integrating these positions in their respective programs is to assign them a percentage of their duties as non-LE. For example, this could be 35% recreation LE, 15% property operations, 40% fire LE, 10% fire duties – a discussion with the area forestry leader indicates this position would be the best fit for a type 8 – if they are going to be responding to burning complaints it would be most efficient if they could suppress a small fire than call additional units not needed.

If these positions were to remain 100% LE, the question would arise - Where do they get their direction? They are directly supervised by an employee who is a forest management bureau person, yet they also work in protection. This situation already occurs somewhat in the program with no resolution having occurred. These positions would exacerbate this issue.

#6_____

The proposed Org chart for the Oneida/Vilas Team changes a tech position at Woodruff to a Forester position.

Based on the private forestry program needs for Oneida County, scattered state lands involvement and professional level involvement on the Oneida County forest, **the vacant Rhinelander Tech position should be upgraded to that of a Forester on the Oneida/Vilas team, and not either of the Tech positions at Woodruff.** The private, scattered state lands and County forest program involvement or workload of either Tech at Woodruff does not merit this upgrade. Based on the para-professional workload of the previous incumbent (used to be a Tech 5), the Rhinelander Tech vacancy would be ideally upgraded at this time - with no opposition or stress, and increased program efficiency.

#7_____

I think it would be a big mistake to rename the U&M team to Industrial Development. This in not broad enough for the scope of the work the program does. “Market Development” does a better job describing the depth of the work done to create the markets needed so forest management can occur and not only industrial development..

#8_____

I am concerned about the large size of teams - especially if vacancies exist. When fully staffed I think the "Ops Plan" really does a good job of allocating our resources; however, if a team of 12 or 13 has one or more vacancy - Team leaders will struggle to cover that work load (particularly if those positions have fire responsibility). Under our current structure team leaders already seem to be asked to do much of the covering of vacancies and it will only get harder with bigger teams.

Our fire control workforce is also getting "leaner" through this process and if any vacancies exist I think it may be very difficult to impossible to staff our type 4 engines unless we have more staff other than technicians trained to operate Type 4s and JD450s, from within the Division or other Divisions.

I am also concerned about shifts in PDs that will require more folks to contribute a significant amount of time to fire control to accommodate less overall field fire staff and seven day scheduling. My concern is that more people will be asked to sacrifice their time/freedom of schedules and risk their health/lives - and may not be fairly compensated for it (i.e. protective status). With the consolidation of LE duties and the distribution of fire duties to more foresters - I can picture a scenario where very few people would qualify to be under protective status in the future. I hope this is not true - and that the reverse turns out to be the case - that all folks who are counted on regularly to contribute significantly to fire control (those with Type 4,6, AND 8 engines assigned to them) - will fall under protective status. To ask folks to risk their lives, risk their short and long-term health, and to sacrifice the time to spend with their families/own pursuits - without some form of compensation sure does not sound like a "fair deal" - and I hope although it would represent another savings of $ it would be at the expense of the workforce. And I know in the FAQs, FLT stated that it will be up to HR and not the division which PDs will come with protective status -- but to be honest in the current political climate of "overcompensated public employees" I find it hard to imagine gaining additional numbers of or even maintaining the number of protective positions.

The final concern I have is regarding District/Area/Team boundary lines. Specifically, I am concerned with the split of Marinette county geographically between two Areas - as the workload (county, state, private, fire) is very consistent. The majority of the Marinette County forest lies north of Wausaukee (and much lies north and west

of Pembine). The fire workload for Pembine also seems to me to line up much more with Wausaukee's than Florence's and Crandon's. I assume the split was done primarily to equalize team sizes/span of control and not simply based on similarity of workload and geographical boundaries. I understand the supervisory span of control concerns and after thinking about our resources (people, stations, and fire control equip.) and considering what the type workload is in each county I have come up with a suggested change to some of these boundaries.

My suggestion keeps teams at a reasonable size, removes the Marinette County split, keeps fire equipment in the landscapes that it is needed, and creates areas/teams that have a more consistent type of workload (i.e. fire control, county, state, private lands).

The only 2 concerns that my suggestion raises to me is that it then splits Vilas County and it would split 4 counties off of the NE District. Splitting Vilas County would create a similar concern as splitting Marinette County - but when you look at a landownership map I think it makes much more sense (although I am less certain based on fire control needs) - as western Vilas county (Trout Lake Station) is primarily NHAL while eastern Vilas County (Eagle River RS) is primarily county forest and private lands. And as such, I think the concerns about splitting Vilas are less than splitting Marinette. Splitting counties between teams within the same area also seems much more workable (currently done frequently) than splitting a county between 2 areas - as coordination can be managed by a single Area Forester in charge. Much more coordination would be needed to work together over area boundaries.

I think shifting Outagamie, Brown, Kewaunee, and Door county into Southern District - Lakeshore Team would help reduce the size geographically and staff-wise of the GB south team - and would also accommodate the south team adding Oconto county. I am not sure if that would cause a problem in terms of coordination with our other DNR functions if the North East District did not include Green Bay (the DNR regional headquarters).

As a final thought - as a "field guy" I winced at seeing the shrinking integrated field staff and growing specialized program (behind the scenes) staff. It is a gut reaction based on a reduced ability to get done the measurable widgets of work that the Division is tasked with doing and based on reduced ability to provide direct assistance to some of our traditional customers (landowners, counties, state property managers) that will be a result - although when I think about it... the need to support wood industries, IT, and other specialized positions is critical and strategic - and the resources must come from somewhere.

Overall, I think what has been laid out looks like a very sound and very thought out allocation of our resources to meet the forestry workload that exists in Wisconsin in 2011. I think it addresses well what the Strategic Direction laid out and certainly represents increased efficiency of program implementation (and I hope effectiveness/quality as well).

#9_____

1. Forestry mechanics - I know these positions are going to be hybridized with the traditional technician position so that they would do mechanical work as well as run a piece of equipment. I understand the reasoning, but I wonder how much folks really understand the workload with equipment and fleet at a shop. The current mechanic serves as backup operator, which appears to work at this time. Especially with the vacancies as of lately, this has been put to the test. But the mechanic is perhaps one of the most over-subscribed employees on the team when it comes to equipment problems, maintenance, inspections, working with LeMay Center, fleet issues, etc. makes him perhaps one of the most frequently called upon person by staff for assistance on a weekly basis. He is also one of the most cost-effective employees the DNR can have on board when we compare the costs of having a mechanic fix a vehicle and maintain it through an ARI vendor. I think a discussion should take place with fleet about the effectiveness of forestry mechanics. Also keep in mind this mechanic fixes stuff for other department programs. Forestry is always the priority, but some cross program assistance keeps the whole agency running smoothly and builds cohesiveness and trust amongst the various functions. I guess my point is

that if mechanics are married to a piece of hardware, we should be very careful as to what else gets "tacked" on to that PD. The mechanic position had a theme…."timely and proper repair of forestry equipment". This is directly linked to the protection of our forests by having equipment that "works" and even more importantly, the safety of our operators.

The logic behind mechanics being backup operators was to give our staff some depth when it comes to equipment operators. The proposed staffing of equipment no longer gives us that depth and I think we ought to consider where else it can come from. One option might be to make even more foresters (who already are fully subscribed) or other nontraditional staff "backup operators" (like select LTE staff, who operate equipment when they are not on the state clock).

2. Team Boundaries- The boundary between Pembine and Wausaukee is very disruptive. Most of the Wausaukee staff would be spending a bulk of their time in the "East Team" working on the Marinette County Forest workload. It makes no sense other than to meet the "span of control" for the team leaders. So I would run a team line through the middle of these two stations simply to meet the span of control, there would be too many disruptions with work planning and coordination. With the North Team boundary plus the addition of Pembine, the team would be up to 14 FTE's, which is sort of alright when there aren't vacancies. When there are, it is completely unsustainable and I believe the wheels would fall off. Fourteen FTE's wouldn't be a team; it would be a traditional area. Thus, I would suggest FLT seeks out a different boundary for the South Team. Perhaps Oconto Falls could be absorbed by the South Team, but the North Team would still have to assist them with Oconto County Time Standards (especially from the Peshtigo crew). Oconto Falls is a better "fit" with the Shawano area as well as Brown County and it brings the North Team down to about 10 FTE. That would at least help address the "ripple effect" of tweaking lines down south in order to accommodate what I just described. An option beyond that would be to have the North Team also supervise the north half of Oconto County (say from Hwy 64 and north), if an office at the Lakewood Forest Service Station ever comes to fruition. This would be a good fit for the work that needs to get accomplished up that way.

3. Size of Areas - I truly believe that the proposed size of the "Green Bay Area" would be a logistical nightmare. The area forester would have to take care of two operational fire plans, manage the Menominee County liaison issues, oversee all the prescribed burn plans/proposals for all these counties and have one dispatcher taking care of the whole ball of wax makes me wonder…... "how?". I don't believe this scenario would be effective and efficient given the lay of the land and the equipment assigned. Do you recall the days where Peshtigo also dispatched with Bowler and Keshena? On a spring day, the radio was full…now add Waupaca to the mix! I believe in the area leader concept. The system has worked well for years, but it has been because of manageable geographic areas. We can't expect the same outcomes to happen when we increase areas from 2-3 counties up to nine, which is more of a region or district in itself. In reviewing the map and looking at other areas that have similar workload issues, I see that they all have 4-5 counties and I would suggest we tweak the Green Bay Area line so that it fits in with those other areas. My suggestion is to keep it to Marinette, Oconto, Shawano, Menominee, and Waupaca at the very most.

#10_____

I had asked the question during the town hall meeting today about how the decision will be made as to who leaves and who stays in a situation where there are 2 technicians now and will be only 1 after the Ops plan is put into effect. Neither incumbent is near retirement age, so one of them will need to find either a different station to work at or a different position (i.e. - forester, etc.)

I feel Paul's comment of "rip the band-aid off" is best so those impacted know and spouses can also relocate as needed. The longer decisions about which person relocates (and when) gets put off, the less opportunity to find something that will work and can settle down to raise a family. So my comment is "rip off the band-aid" and get it over with, then let transfers happen right away, so the affected employees can make family decisions.

#11_____

Comments for tomorrows Town Hall Meeting - or I suppose they could be discussed at the State Forest Live Meeting:

1. After the public comment period is over what will the process be to make any adjustments? Will this be handled solely by FLT, one of the teams from last summer, or another committee?" When will staff see finalized org charts reflecting any of these changes?

2. Can you speak to the nine positions that are not represented on the org charts/maps? Do they reflect a prorated portion of each program?

#12_____

I have had some time to digest the proposal to eliminate the tech position and meld it into another program. I see the practicality of it and appreciate the current state of affairs in the Department to downsize while mitigating adverse effects on people. However well intended on paper, I think in the long run it may be less effective and a liability for a variety of reasons.

At one time there were two techs/FFCAs at Tomahawk. The push was to have two per heavy unit and there was discussion of a second heavy unit. That never happened and the second position was shifted elsewhere or eliminated, I am not sure which. At that time there wasn't enough work to go around for two people and no one mourned the loss of the second position. There was always a percentage of this position given to other workers for various duties through the years, however, as priorities changed that became less and less, and eventually, none at all.

Currently, the PD description says…"The principle duties of this position involve active fire suppression and prevention requiring frequent exposure to a high degree of danger and also requires a high degree of physical conditioning. This position is protective level classification for retirement." 55% of the position states "Fire Management Activities Designed to Aid in the Prevention, Presuppression, and Suppression of Forest Fires to Minimize the Losses Caused by Those Fires." Currently local towns are considered Lop 1 under the old classification and FL 9 under the new and improved classification. Nasty areas for crown fires! The Command and Control Work Group recommended a permanent tech position here as being the optimal.

From a safety standpoint, protective status standpoint, training standpoint and liability standpoint will this amount of effort be similar by shifting to the other program? I sure hope so, because in my humble opinion, that is the least the local community should be given. I believe it takes at least 6-10 years for a person with fire responsibilities to feel knowledgeable about what they do in fire. It should not be minimized to a part time basis when the public (i.e. life, property, resource) is being protected. If this position leaves, who will do those duties that are currently being done - maintenance of equipment, fire prevention, etc.?

My gut reaction…this is not good in the long run!

#13_____

The term professional work has come up a lot. Certain technicians are doing a lot of "professional level work". Will capable technicians still be doing professional level work? What are technician vs. forester ("professional") tasks?

#15_____

On November 7th I already have a commitment, thus won't be able to view the Town Hall Meeting, so here is a question/concern I have. If I understand correctly the Regional UF Coordinators will be supervised by the State Urban Forestry Coordinator and while I think that direct line arrangement makes sense in many regards, I am concerned whether this person will have the time/ability to supervise folks as well as address their own tasks.

Are these realistic expectations or will the State Coordinator be released or off load other duties they may have been responsible for in the past?

#16_____
There are a few things from last week's meeting that I still have questions on. I believe that you may not know all the answers for all of the questions, but I you may able to forward them on. I don't understand how a plan can be rolled out without any nuts and bolts determined to make it work. It seems to be a pipe dream and no thought into the end product.

Why talk about writing three PD's for a team when the plan only calls for two people. Why would any body put time and effort in something that will not be here?

Secondly, it was stated this could take several years to make happen, but in the FAQ's it is clearly stated that this is not open ended and there is a time limit. What is that time limit?

Third, if I am the person who needs to leave and take a transfer, is this transfer voluntary? Would I fall into the new physical standards? I would, according to the way the FAQ is written. This would be a penalty for transferring out of here.

Fourth, the plan clearly states that a tech position is a public land tech. If one of the techs doesn't have much public land responsibilities in their PD, he or she is out. So why is nobody giving those people a written At Risk Notice? Or is hearing that a position is being eliminated, the VERBAL at risk notice? I believe it is.

When will HR be notified of the plan so we know what the rules are in order to be placed elsewhere? What and where do we find the civil service rules that will be followed?

Why are we filling tech jobs when FLT stated no hiring until we know where people will need to go? Seems forestry is screwing its employees by stating we will not place new people until the plan is in place.

I believe there needs to be some rules in place soon so that if there are opportunities for other career paths or openings people can make informed decisions. The state will not look out for the best interest of its employees and their families. That has been proven in the past.

#18_____
In the Ops plan, resources have been allocated by county, yet several FRU boundaries cross county lines, and include 2 counties. Are any FRU boundaries going to change, and if so, when will we see those proposed changes?

#19_____
Was the data used to decide how to place staff and equipment proofed by field employees or 1st line supervisors?

#20_____
1. Regarding the assignment of the new hires: In order to give current employees more flexibility/options to manage the changes, can the new hires be placed temporarily with the understanding that they may receive a different assignment in the future? This would be similar to how the forester classes have been handled in the past. They were aware that they would have to live and work somewhere for an undetermined amount of time and then eventually they would receive a permanent assignment. This seems like a reasonable solution to address workload and accommodate current employees and their affected families (personal and DNR) by holding open more options.

2. Related to the new Physical Fitness Policy recently implemented by the Division and in light of the increase of shared responsibility for fire suppression responsibilities included in the OPS Plan - How will the Division determine what positions can have fire suppression and Rx fire responsibilities removed from the PD? If the Field Test is the new physical fitness standard/condition of employment, does this mean PD's will not have fire suppression and Rx fire responsibilities removed in the future?

3. Is the OPS Plan providing enough FTE's to actually accomplish the assigned workloads of each team? If not, how does the Division plan to make up the difference?

4. Does the Division plan to use the Merit Pay System to compensate individuals, such as technicians with 4 year forestry degrees who are assigned forestry professional job duties? What about Foresters who fill-in as supervisors?

5. I have heard directly from some staff involved in the evaluation/assessment process that what came out in the OPS Plan is not what information indicated and not what they expected. Why would they say that?

#21_____

We are hearing constant reference to foresters being shifted to more fire to cover that program; a bucket that is to be reduced. We have heard little the other way, where say a LOP1 ranger would be shifted to the State Forest to do more state forestry which is a bucket that needs more.

#22_____

1. In the Ops Plan, it states that there will be new work/rest guidelines for fire folks to follow. Can you explain these guidelines (if known) and any changes that may occur for folks in the fire program versus what happens now?
2. Do you see any issues for implementing this Ops Plan when the state's Comp Plan starts on 1/1/2012?

#23_____

Lump Sum Sales - Isn't selling sales lump sum just going to shift the work load from scaling/timber sale administration to more intense cruising?

#24_____

How are our partners, either within the Department or externally, involved with the decision making process of implementation of the strategic direction?

#25_____

Will there be any opportunities for forestry technicians to promote to forester positions using a tech 5 type model?

#26_____

The comp plan seems to suggest that techs will not earn comp time but will be paid at time and a half. It seems ranger will have the option of comp time or time and a half. Is it the division's intent to eliminate comp time for techs?

#27_____

Regarding the question about when currently there are 2 Tech positions at a station and new structure has only one… As I type, we are offering positions to new foresters/techs… My question is what if one of the positions that is being offered to a new hire today would be a top choice of the displaced individuals? Have you thought about holding off on hiring until our current staff has been placed accordingly? Have a good one!

#28_____
With 7 day scheduling and including more foresters that are not currently protected, to do initial attack, which is usually a protected position, who is going to be considered protective status, assuming we will still have a protective status.

#29_____
During the spring fire season how will our staffing schedule be conducted?

#30_____
If a position is included in the ops plan and is currently vacant, what is the expected timeframe that all "boxes" will have a live person?

As the ops plan is implemented over the next months, what is the plan for evaluating the outcomes?

How will "missed targets" be addressed? And I mean missed by over shooting and under shooting. And will the targets themselves be reviewed?

#31_____
The Ops Plan on page 8 under Workforce Alignment indicates a number of HR processes will be used to fill positions including direct appointments, laterals, open recruitment. Please specifically identify which positions will be filled using which process. This information will enable impacted staff to understand options available to them.

#32_____
Why doesn't the SD Ops Plan on pg 2-3 address the specific reduction number of FTEs in the nursery program as outlined in the business plan and only refers to it as "scaling….staffing". What does that generic terminology mean to the employees working in this program or to externals? The Ops Plan clearly identifies additions and reductions in other programs, why the inconsistency here?

With the Genetics position being identified as a "Forest Sciences" (where is this on the org chart?) service function, how will this FTE fit with the nursery program supervisor position?

When will an organizational chart, like those currently on Forestry's intranet page (little boxes showing each individual position and supervisory reporting) be developed? The staff allocation piece is very difficult to read and follow and does not provide the detail that some staff are seeking. A consolidated chart showing +/- FTEs (current vs. future) to compliment the SD Ops narrative would also be useful to those who are analytical or visual recognizing that various boundary changes makes it difficult to compare apples to oranges.

The Ops Plan states the supervisory structure will be shifted on July 1, 2012. Does that mean all of those positions, including the new reporting structure for the specialty programs, will be filled by that date? That statement seems incongruent with the following reference to "staff changes will be implemented gradually" and the discussion in the workforce alignment section.

#33_____
The timing of the implementation of the strategic direction concurrent with the hiring of new foresters and forestry technicians has created situations that are causing GREAT amounts of anxiety for "displaced" workers. Before employees make career changing decisions I would hope that the division would work with the displaced individuals as soon as possible, as a matter of professional courtesy, to let them know specifically what options that will be available to them. It seems that with the shuffling of personnel that will potentially be taking place, it would have been appropriate to delay the entire hiring processes until current employees were made aware of the situation and given opportunities to move into open positions prior to offers being made to new hires.

The timing of the placements of the new foresters (and possibly of the new technicians if those hires go forward as scheduled) prioritizes the short term mission of the department before the long term wellness of the current employees and is resulting in another decline in employee moral and trust it forestry leadership. This situation also creates several questions (some of which are):

- Have offers been made to the foresters who were just interviewed?
- Will forestry technicians, who are 4 year degreed foresters and have been serving in positions that are proposed to become foresters, be given an opportunity to fill positions that they have filled?
- Going through the forester hiring process the prospective foresters were not aware that they would be asked to be heavy equipment operators, right? Do you not believe that not a game changer for some? Do you plan on making offers to foresters without having PDs in place that will reflect what their jobs will look like in the future?
- Are future technicians going to be able to mark timber and do other "forester level" work that they have been doing to very high standards for years?

They need some firm options and answers so they can get some sleep. Please advise how this process is going to unfold.

#35_____
How do I know whether the LTE numbers on the draft org charts are correct? I have heard conflicting information about whether the draft organization charts include federally funded LTE's or only represent state funded LTE's. I do not have any information to assess whether the draft accurately represents FLT's thinking of what our future will look like.

#37_____
What would constitute "Primary" in a PD?

#38_____
What is the plan for letting us know what these changes are? Will our staffing be different for the 2012 fire season? Will it affect protective and non protective?

#39_____
The Forestry Bureau's Org chart shows only 2 LTEs with the Rural & Urban FIA position. As I understand it, with the addition of Urban FIA there will be an additional LTE position added. Currently there are two LTEs and there should be a total of 3 LTEs after the Reorg. There are other positions in the chart with, apparently, incorrect numbers of LTE positions as well. So are these just errors in putting the chart together, or are these actually the intended number of LTEs by position after Reorg? If these are just errors in constructing the chart, seems to me it should be corrected now, so there are no misunderstandings later. Just wanted to get this in writing so it doesn't fall through the cracks.

#40_____
The ops teams this past summer developed Goals, Guiding Principles and Tasks for the different sub-programs. What has become of that work and should the sub-programs be using it to implement Strategic Direction?

What specific counties will be assigned to the 4 Coop Rangers assigned to the Districts respectively? If it is not decided yet, when will we know? Who is drafting the PD's for these positions?

#41_____
I'm looking at the Integrated Workload Allocation map and would like some definition/clarification to help in work planning through the transition. It's apparent that for each classification (Forester and Technician) the Big

Four percentages add up to 100%. What total hours does that represent for each classification? OR, what percentage of each classification's 1820 hours per person is represented in the Big Four?

Second, it's apparent that FLT must have made some decisions as to what constitutes Technician work vs. Forester work. To assist me in my work planning, can I get that "division of work" information?

#42_____

Here is a comment I have in regards to question #2:

Are there changes in how we are proposing to allocate resources that could better address the program intent statements outlined in the Strategic Direction? Please explain why you believe your suggestion for allocation is better than what is proposed.

I like the proposal that consolidates law enforcement positions. I have never felt comfortable with position descriptions that have law enforcement less than 50% because in order to do law enforcement, you have to be proficient at it all the time. I would hope, however, with these hybrid *(I don't know what to call them, so I'm calling them hybrid - the positions that are labeled "Law Enforcement FRLE / Rec" on the org charts)* law enforcement positions located on state forests, that some time is allocated to the maintenance, administration, or recreation programs.

I don't believe there to be enough law enforcement in an area to sustain a person doing 100% law enforcement year round. And if I'm wrong and there is enough law enforcement, there is still plenty of maintenance and administration of the recreation program that needs to be done. Currently, in a Ranger/Assistant Property Manager PD there is 75% of administration of the recreation program, which includes development projects, administrating the recreation program, and running the LTE maintenance and visitor services staff. That 75% will need to be allocated to a forest superintendent, or even the forester senior, but 75% is a lot to cover by 2 staff that already have a pretty full PD I imagine. If that 75% can be spread amongst 3 people rather than 2 people, I think that would alleviate some workload issues and keep the hybrid ranger busy year round when it's slow on both the recreation and forestry law enforcement needs in the area.

Also in regards to the hybrid LE positions on state forests, I do have a concern over the superintendent being the supervisor for that position when a large percentage of that position is doing law enforcement in another area. I envision some issues arise when a law enforcement need is required on the state forest but there is also a need in the area. As the superintendent is the ranger's supervisor, I can see that the need is met on the state forest but maybe not in the area. There will have to be some coordination involved, and everyone will need to be held accountable. This might be a crazy idea, but it might make sense that the area leader supervisors the hybrid rangers as the area leader would have knowledge on the needs of the area and the state forest when it comes to law enforcement needs.

Here is a comment I have in regards to question #3:
Are there opportunities for increased efficiency and effectiveness in program implementation that we have overlooked? Please explain how your suggestion would increase efficiency and effectiveness.

I would hope that a forest superintendent on the smaller state forests would be required to have natural resources credentials, and a portion of their PD dictate that they perform law enforcement duties on the state forest. Currently, only the Ranger/Assistant Property Manager performs law enforcement duties on the state forest, with the help of an LTE ranger 6 months out of the year. Having 2 people perform law enforcement allows for extended coverage on busy days, allows rangers to work together when necessary, and allows people to take time off for personal reasons. There needs to be a second person with law enforcement credentials that actually uses them so 1 person isn't required to work all the time, or if they don't work then leave the forest without any law enforcement coverage. This isn't an issue when it isn't a busy recreation season, but during the summer to not be able to take a weekend here and there is hard on an employee and leads to a quick burn-out.

#43_____

In reference to question 2 - A suggestion for FLT to change the proposed resource allocation as it pertains to Mechanic duties at Friendship. This is not a change in allocation of positions but of the Mechanic workload.

The Mechanic duties are currently assigned to one of two technician positions at Friendship. It is proposed that we move the Mechanic duties from one of the two technicians at Friendship to the third technician position at WI Rapids for the following reasons:

- The duties are still in the assigned Area and would cover the same workload. Should not impact other areas or teams
- The location has better facilities and is more central to cover workload
- The location has better access to private services and supply stores
- Local area supervisors feel it would better balance the workload across the Rapids and Friendship teams

#45_____

I have a few comments and questions about our Strategic Direction specific to Wausaukee. First, I was surprised that we would omit a Forestry Technician position there when it is the 2nd ranked fire landscape in the state and has the 2nd largest County Forest and the Private and State lands workload seems to be comparable with anyplace in the state. The real question is, how is this going to play out between the 2 techs who both have spouses working in the area, maybe at better jobs then we have, both are active in the community, and neither intend to move to another job. The only transfer options that would avoid the need to move, would be Pembine or Peshtigo, and neither have openings at this time. Retirement is 5-7 years away. How is this going to be implemented and how is this going to affect us? Look forward to hearing from you, Thanks.

 # 47_____

First let me say that I do appreciate the great amount of work that has been completed on the Operations Plan to meet the Strategic Direction. It's very obvious that as I read through the Operations Plan, there are many facets that were addressed and considered.

I want to address what I feel, and have seen as a major inefficiency in our current system; the integration of duties. Although it can be said that integration provides diversity in work as some may prefer, and appears more logical to implement due to the team concept, it does not provide efficiencies that result when one person can concentrate their activities toward the fulfillment of one of Forestry's identified goals. I will use the word "specialization" to describe this concept of concentrating activities for an individual's responsibilities. For example, the Operations Plan process has identified only one, maybe two, new areas for field specialization. These include law enforcement and possibly the new Industry Development positions. These specialized positions, if I understand correctly, are not embedded within the team/area/district supervisory and reporting structure. There's a tendency I believe that when DNR Forestry specializes, then the supervisory and reporting structure becomes centralized. I would hope that specialization be implemented at all levels of the structure, but primarily at the team level.

Please just bear with me as I take a step back. Take a look at a typical DNR forester today. That forester must work on state lands and understand all the forms and processes, develop the relationships with the property managers (most likely more than one), work on county lands and understand the goals for that county, develop a relationship with the county administrator and county forestry committee, take calls from citizens on a variety of concerns (not all forestry), administer the local MFL program and fully understand it's complexity, develop working relationships with loggers, industrial foresters, and consulting foresters, contribute to the fire program through many different avenues, understand NHI's, BMP's for water, BMP's for invasives, understand all the inputs/outputs and procedures of WisFIRS, etc. etc. If there's a push for work on state lands, and then the phone rings every day from private landowners looking for assistance, or consulting/industrial foresters needing

MFL information, what does the forester do? Well he/she sprinkles time across all of it, and in so doing, loses efficiency. It's like putting greasy work coveralls in the washing machine with towels, dress shirts, and slacks, adding soap, turning it on, and hoping all will come out clean.

Although I can't come up with any data (I wish I could as most of us are data hungry) to support efficiencies gained over the long term by specialization of positions (primarily responsibilities) vs. generalization, look at the WUI program and how much it has improved with designated WUI positions. I also can't support with data, but what I believe is true, that over the long term the efficiencies gained by specializing positions far outweighs any pros of generalization (I can only think of one pro for generalization and that's the ability to cover vacancies quickly - but covering vacancies quickly is short term thinking as the organization should have the ability to hire or contract for the vacancy in a timely manner).

As you may know, I've been with DNR forestry for a short time (maybe 6+ years now). There is a major difference between the two (DNR and industry) in how workload is handled. Industry foresters are specialists and learn to become very efficient at their jobs and have a high level of expertise. DNR foresters like myself, have to be generalists with a moderate level of expertise or what is called the "jack of all trades and master of none". During my entire career I've always looked for ways to improve my efficiency and quality of work. I have struggled with the efficiency issue with my work for DNR Forestry and I am bothered with it almost daily.

What I am asking, is that the integrated programs be reevaluated. Specifically, it appears that once the decision was made to use county as the basis, those involved in the Operations Plan process went down one road toward integration. What if State Lands, or Private Forestry, or County Forestry was specialized, but supervision and reporting remained embedded within the team/area/district structure? Maybe this is what Darrel may have mentioned during the November 10th session when he talked about PD's with HR and then team leaders developing positions based on needs but within sideboards created by FLT (did I understand this correctly??). Also, is the primary reason for integrating the four programs due to the seasonal nature of the fire program? I would believe this to be the case and I do understand that because of the seasonality, other available work must fulfill the time available. This is complex so at this point I can't offer a level of integration for the fire program, but I believe some considerations I've listed may bridge the gap.

So let me offer some ideas to consider:

Consider specializing positions at all levels of the organization, with a priority toward the team.

Allow flexibility within teams/areas/districts to assign responsibility to positions. I would hope this would be specialized responsibility and not integrated responsibility. Note here that I make a distinction between responsibility and work task.

Allow flexibility to work across team and area boundaries, and even district boundaries, by packaging specialized responsibilities, while keeping the team/area/district supervisory and reporting structure intact. WUI is a close example, and another may be the new LE positions depending on how that area is structured.

Produce base PDs solely on programs (create a PD for private forestry, another for fire, another for county forestry, etc.), then allow areas and teams the flexibility to mix and match the base PD's into a position PD to meet their needs and available skill sets.

One side note not related to specialization vs. integration is that the tools necessary to do any of the work to meet the goals of DNR Forestry should be provided. I am talking specifically here about vehicles. It makes no sense to give a forester a goal to meet Forestry's needs and not provide a suitable vehicle to get to work locations with all the gear needed. So please consider efficiencies that can be gained or lost on this issue.

Providing my comments has been difficult due to this complex Operations Plan and trying to articulate all my thoughts and ideas. I would be willing to discuss my thoughts in more detail if you so desire.

#48_____

We talked briefly about the discrepancies on the map for the County Forest program. The number of hours is typically just short of the requested time standards. We attributed this to possibly some extra time that foresters have contributed and were not accounted for in the 1705 / FTE figure used for the conversion. I'm OK with that and understand that those are approximate breakdowns for development of the PDs. Of bigger concern is the apparent mistake for Burnett County. The requested time standard is 2333 hours (split between foresters and techs). On the map the CFL hours for Burnett County are nearly 400 hours short of that and we need to fix this. It does not appear there is any error in the formulas. How do we fix this?

#49_____

With respect to employees who may need to consider a new position, will there be any information or guidance coming out to supervisors and employees on career development plans? What can we expect?
Where can one find the civil service rules that will dictate how any voluntary or even involuntary transfers will be implemented?

#50_____

In 1990, the Area Forester at the time decided to split the Sub-area into 2 separate sub-areas (now called FRU's). The primary reason for this split was simply due to the size of the area and the subsequent fire workload. He felt it warranted 2 Forester-Rangers, 2 4X4's, 2 heavy units, etc. We have operated with that organizational structure since that time. In my opinion, it seems to be about the right amount of staffing and equipment to meet the forest management and fire needs.

As mentioned, we currently have 2 Type 4 engines, 2 Type 6 engines, 2 Techs, 2 Forester-Rangers, and 2 FRU's. In reviewing the proposed Operations Plan, a reduction of fire equipment and staffing is planned for this county. What is proposed is 1 Type 4 engine, 1 Type 6 engine, 1 Type 8 engine, 1 Tech, and 2 Foresters. There is also no fire equipment listed for the adjoining County. I am assuming that there are no proposed FRU boundary changes. Given that assumption, we will now be covering the same amount of area with less staff and less equipment. I have prepared a list of quick facts to help review the data of the 2 FRU's.

- Combined area of both FRU's is 750,000 acres.
- Over the last 10 years, the 2 FRU's have averaged a total of 39 fires per year, burning just over 75 acres
- Distance within the 2 FRU's covers over 75 miles
- The eastern portion offers more than a normal amount of fire workload, and thus demands a bit of extra attention.
    1. This area has 4 separate Fire Depts that have coverage within the area of our protection
    2. 2 large schools with > 500 elementary students
    3. >2400 structures within a particular area, thus generating many calls, many of which come from the local tower
    4. The eastern portion averages 10 fires per year within our area

Here are my suggested changes to the operations plan following the recommended format.

1. I want to be sure that the team recognized that the eastern part of this FRU is significant, and that it indeed demands a sizeable amount of fire effort. The above data listed illustrate that point.
2. In my opinion, the proposed equipment for the 2 FRU's is inadequate. I would propose that the 2 Type 6 engines, 2 Foresters, and 2 FRU's remain. The fire workload and size of the FRU's warrant that amount of state investment.
3. Increased efficiency: 1 Type 4 engine is proposed to be removed. I realize this proposal was not taken lightly. I personally feel with the size of our 2 FRU's (approximately 16 Townships for each FRU) 2 Type

I offer these comments for careful consideration. I realize your task is immense, and you have done a great job so far. Thank you for your time……

#51_____

Regarding changes to resource allocation - I see that 2 heavy units have been taken away from the Northeast District (one in Langlade and one in Florence) that currently provide some of the "Iron" needed to protect the high fire hazard area in Fire Landscape 7. I don't think reducing the heavy units that protect or support one of the highest hazard fire landscapes is appropriate. Those units should be re-allocated back.

Regarding opportunities for increased efficiency and effectiveness -

- The splitting of the current team at Wausaukee and Pembine is a decrease in efficiency and effectiveness. This is a well run team and splitting them makes no sense. Staff from Wausaukee will be traveling by Pembine to get too much of their County forest field work. Marinette County Forestry is one of the best county programs in the state, partly due to the excellent assistance from the current team. They deserve to have their DNR assistance coordinated and supervised under the existing team. Remove the split in Marinette County.

- Along with removing the split in Marinette County, the proposed Green Bay Area should be organized into 3 teams instead of 2 teams. (not including the Peshtigo River SF).
  Team 1 - Marinette County - 10, field staff. See the reasons listed above.
  Team 2 - Oconto, Outagamie, Brown, Kewaunee, Door Counties - 8 field staff. Staff is familiar with each other, has worked together or assisted each other in the past, and has common management issues along the Bay.
  Team 3 - Menominee, Shawano and Waupaca Counties. - 9 field staff. These counties have been together as a team in the current Waupaca Area for a long time. They know how to work together and will be efficient at it.

  As an **additional option** the staff and counties serviced from Oshkosh and Mishicot could be added to Team 2. This will reunite the former Lakeshore Area into a common team. There is a lot to be said for familiarity and continuity.

These changes are **more efficient and effective** for several reasons; they preserve the past close working relationships and efficiencies of staff under the current organization, reduce span of control for team leaders, provide better continuity in a time of radical changes to the Forestry Division. Plus another team leader position is created providing more options for advancement or a landing spot for soon to be displaced staff.

- Without knowing the specific duties the 3 staff at the Peshtigo River SF it is tough to tell whether the proposed organization is more efficient and effective than currently organized. Who else, if anyone, will be doing LE on the forest besides the FRLE/Rec position? At times it is necessary and good to have 2 officers working the same shift; such as busy summer weekends on the water, deer season, summer Holiday weekends. Also, I think it is more efficient that the FRLE/Rec has a certain small amount of operations work in their PD so they can assist on the property with some level of maintenance. Deep winter months may be lacking enough LE work to fully occupy their time.

- When will the LTE allotments for the PRSF under the new organization be known so necessary planning for

and hiring of LTE staff can be done. It is hard to know if the proposed organization will be as efficient and effective as the current without knowing what can be hired for LTE staff that do the bulk of the summer recreation maintenance and VSA work.

Comments

- The proposed Coop/FRLE position at Oshkosh could be appealing if it is possible to station it out of Green Bay instead of Oshkosh and supervise it from the Green Bay Area. This would more than likely ensure the supervisor has a fire and LE background. The sooner the job duties are made known the better too.
- Placement of new hires into permanent locations and elimination of a forester position at Oconto Falls have taken away options for landing spots. It's hard enough losing a position and then seeing possible local options eliminated adds even more stress and anxiety.

#52_____

1. A new forester position showed up for our county and station. I believe work goals there have been met with existing staff, despite vacancies. The former forester had lands responsibilities as part of his workload that went away when he retired. The present forester does not have these so I assume the workload is covered with what staff there is. I guess I'm not sure what or where the workload is for this position.

2. In regards to fire equipment, the chart showed a type 8 at the station - assumed Forester's truck with a slip-on.
We have not had this in the past and I have not seen a tremendous need for an additional unit. Most of the fire departments have been getting brush type units and so there isn't seem to be a large shortage of these. We have used the forester on fires but generally when we need help with special circumstances or there were access issue, i.e. to haul ATVs, boats, pumps etc. not so much in situations where a type 8 truck was needed. Also they were part of the IMT team. If they are to work at IA attack under a 7 day schedule to relieve the ranger, they would use the Type 7/6. I guess I would question if a type 8 was really needed and perhaps then the forester's vehicle could be something that could be more fuel efficient that what we presently have. Something more green.

3. When I read through the new fitness standards, my impression was that many of the foresters would now have fire responsibilities such as IA with a type 8. I would guess this may be part of the 7 day scheduling plan as well. This may only be a small portion of their time but even so, they would be required to then pass the physical fitness standard. If they could not do so, they would need to find another job that did not require this. Rangers with protective status retire at 53 because it becomes increasing difficult as we get older to meet the physical requirements of fire fighting. However if a forester is required to pass the fitness test, and is not protective, this is an unfair expectation for them to be physically fit until their older retirement age. If the fire part of the job is such that it is not a critical part of the job that if they should not pass the fitness test, they are not required to do it, then working fire becomes somewhat voluntary (choose to pass or not pass the fitness test). This could be a serious crimp in the staffing plan if they were to be involved in IA or in field firefighting.

4. In regards to the 7 day scheduling, most of the fire folks realize that for April and May, fire is what we are doing and we can not make plans. It sounded like even if there was 7 day scheduling, the fire folks would need to be available if things got bad or that the schedule may shift to deal with fire weather so the normal fire people are working the bad days. If this is the case, it makes it the same situation, one where nothing can be planned as you may be working fire. However it may also make this the case for a number of foresters or whoever is also on or may be on the schedule. Going to a 7 day schedule doesn't not net time (work) as someone has to work it so doesn't gain anything as far as productivity. There have been some seasons that we have worked long stretches 35-40 days and perhaps we should have some break once a certain number of days is reached. But these work days are generally not days that we are physically working on fire everyday. It is often

office work. I do mfl plan reviews, fire reports, le write-ups, mfl administration with some field checks on low days etc. Often we have been given the opportunity for a day or two off during the week if weather allows. I admit I often don't do this as I have pretty much planned on being available to work. I feel that if I really needed a day off, -sick or exhausted -I could get it. From a ranger standpoint, I understand the team leader was suppose to be available to fill in (protective status) should we have the need. I also do not understand how the 7 day schedule works at a station where there is one tech and no one else is allowed to operate the dozer. Training someone else means lost productivity in training time especially if they are to be proficient and safe. I believe there use to be an extra tech per area to provide some opportunity for a break but these seem to be eliminated with the new plan. Saving money also is a reason. I'm unsure of how the new comp plan will effect this but assuming the old comp plan implied it means less half time/overtime for the techs and less comp time to be potentially cashed in by the rangers. For rangers cashed in comp time means more money but should also mean more work done/hours. Whether this is good or bad depends on where we are hurting more - money or productivity.

5. In regards to a LE specialist for the area and eliminating credentials for all the rangers. I can certainly see the advantage of having a specialist. Beyond the normal tickets, we often get cases that we have one or two times in a career. Also true for foresters with tax law enforcement. There is just no way to be proficient at these without some help (or need a lot of time getting up to speed). However, even without credentials there are some training requirements for those dealing with LE. Maybe more so now with the foresters who have proposed IA responsibilities. So overall, I'm guessing it doesn't save on a yearly basis for training. However, by not credentialing rangers it will save the required LE school which is quite a burden on all new rangers as well as those that cover their workload while away. With that in mind and that credentials will disappear, it seems unfair to make those presently slated to go to LE school to have to go through it. I understand we have a commitment but if only a fiscal one, allow the rangers to work instead of go to school.

#53_____

State Lands - Land Control Comment

1. *What work that is important to our ability to implement our Strategic Direction have we overlooked? Please explain why the work is important in your opinion.*

I am concerned about how the Land Control pot was distributed amongst state forests. Having been on the state lands team I know that the pot was distributed with little discussion by team members. Basically, because time was limited one individual assigned the dollars with limited discussion by the team. Two properties, the NHAL and Peshtigo River, received a relatively high amount of hours for this while all other properties received zero hours. In the case of the Peshtigo this accounted for 340 hours of staff time for a forester. I never saw the narrative for this but I believe it deserves additional discussion.

2. *Are there changes in how we are proposing to allocate resources that could better address the program intent statements outlined in the Strategic Direction? Please explain why you believe your suggestion for allocation is better than what is proposed.*

I recommend the hours for the Peshtigo be reduced to ~80 hours and that these duties are assigned to the Superintendent. This would be consistent with other properties where Superintendents often fill this function. Land control can be a high profile with public relation ramifications and these actions are best placed in a superintendent's control.

Because of the relatively small workload for the newly created superintendent at the Peshtigo, compared to larger state forests these duties should be easily absorbed by this position.

I would also recommend that the Flambeau deserves some consideration for a portion (~160) of these hours and that they be assigned to the hybrid LE/fire ranger. The Flambeau was discussed as a property with a high

workload in this area but did not receive additional funding or staffing. The additional dollars left could be used to increase the centralized pot available for contracting surveys.

#54_____

I think it's great that you've all taken the time to not only think about how to best make change to the program, but clearly communicate and offer an opportunity for folks to provide feedback. I see the contrast in other parts of the agency where changes are not well communicated, understood and minimal input is sought. It's refreshing to see such an active engagement from stakeholders in making changes. I know it's not easy, so THANK YOU, it's greatly appreciated!!

Overall Timeline:

- I think the implementation could be shortened - not wait until the beginning of next fiscal year to make some of these changes. If this is needed to get all the systems in place I understand, but later in the ops plan it mentions that some of the systems might take years to catch up. Shortening that time, limits the time in limbo, this in my opinion, causes anxiety for folks. I realize where people may need to re-locate, re-apply for positions, etc. and this isn't really a long time for some of that. In some areas as an example, there are a number of positions that would need to be filled. Having to wait on filling positions (not new ones but existing vacancies) until the beginning of next fiscal year will delay other positions being filled. For some of the staff where it may mean much needed relief and programs waiting for assistance, it feels like a really long ways out.

Specific comment re: Enhanced Integration:

- On page 3 of the Ops Plan it talks about Enhanced Integration - having the duties spread out between parts of our program. Then on page 4 under Fire Protection it talks about current funding for training being maintained. How can you increase the number of people overall work on fire related activities and not increase the investment to train those staff? Was everyone in the field going through training regardless of how much they used it in the past? If not, I think the training needs to be in alignment with the staff required to perform those tasks. If this is already happening, a clarification might be needed.

Privately Owned Forest Lands:

- There is a comment about undertaking a thorough evaluation of the administrative processes within the program to generate additional time savings. From the WisFIRS perspective, it has been challenging to get program involvement in doing some of that and thinking about where we can automate processes. It would be good if the review that is happening will look at what's being proposed for WisFIRS when it comes to reducing administrative costs. Doing this sooner rather than later if WisFIRS is thought of as a tool to streamline this process will be good.

Supervisory structure:

- I think the newly proposed supervisory structure will hopefully provide better consistency statewide by altering the boundaries between regional and districts. It will be good to evaluate that as we move towards implementation. Are other programs taking a similar approach?
- With all these new changes, will there be an opportunity to have one statewide location that identifies all the changes between the various programs? That could be a clickable map, or the new Automated Staff Directory? Has anyone checked in with the folks doing the staff directory about these new changes coming down the road?

Alignment of resources and management systems:

- If the alignment of resources and management systems could take a few years in some cases longer, and this is only a 5 year plan does that make sense or should an emphasis be placed on updating those systems shortly after implementation?

Specific question Alignment of Management Systems:

- Page 9 - what does the following statement mean? "Work planning, accomplishment reporting and activity codes will be refocused and better integrated into one system". Is that department-wide of a system that Forestry is proposing? If it's for FR, we should ensure we have those IT resources to help with a "system".

#55_____

My question is regarding the costs and projected financial benefits of the strategic direction planning process, and of the subsequent implementation of the plan for the future.

Is or was there a cost / benefit analysis done of the sum total cost of the planning process (i.e. personnel, facilities, meetings, IT support, consulting services, expenses, etc.) versus what the projected annualized costs/savings will be? And how will future costs for the next five years once the strategic plan is fully implemented compare with costs incurred in the last five years under the previous division organizational structure?

If one was done, is it available for review? If one was not done, is there a plan to do one?

#56_____

Is there a reason why we can't use a common term to distinguish the 3 levels of management, i.e., using the term "leader"? Can we have Bureau Leaders and Section Leaders in addition to Team Leaders, Area Forestry Leaders and District F Leaders? Just wondering why we aren't consistent in our language.

Regarding PD development: I am wondering about designing a PD around the outcomes the job holder needs to produce in the job rather than by bundles of activities associated with sub programs. I wonder sometimes if the reason we have integration issues is because we categorize work through constructs like sub programs that actually reinforce separation. It is how we think about things. I have no idea if this is feasible but it is a thought in my head right now.

#57_____

Straight up and may just be oversights on the map but I notice no service centers listed in Superior or Ashland on either the Staff or Fire Equipment Allocation Maps. Are they no longer needed or were they just missed on the map?

What are the proposed work/rest guidelines? How many days on/off in a given time period? I am in favor of this change as I personally cannot work 65 days straight without starting to run stop signs and put metal containers in the microwave. Connected to this however, I don't think you need to have everyone in forestry assigned to fire with a slip-on/type 8 to accomplish this. There is usually some break in the weather at some point that can be utilized to get primary fire folks some time off after a long work stretch. If I am off for this reason someone can be using my type 6. Also, <u>we don't have enough fires to keep everyone sharp with their IC and/or tractor plow skills now</u>. What are we going to do with even more people to keep up to standards?

With respect to the MFL program and increased use of audits instead of "individual reviews" how do we as field staff signing off on plans/cutting reports attach our name to that as approvable if we don't know for sure. I feel like I am already taking some risks signing off on things…I would not like to be in the position of being out with an auditor and seeing something that was wrong that I signed off on.

I know I'm not specifically addressing your 3 questions you asked. But in relation to the third about increasing efficiency and effectiveness I caution you on "integrating" us too much. We have a huge variety in our work across the 4 main program areas. Right now I feel inadequate in keeping up with what is happening and keeping skills honed in the 2 that I work in primarily. The "Jack of all trades" adage is something to consider. What kind of workers do you want? If we are too rushed to truly do quality work what kind of service to the public are we

really providing? I do not disagree that we should be cooperating and helping each other with marking, burns, recon etc… But Fire should not be minimized because our fire season is "only 2-3 months of the year". It is still a critical job that can have serious consequences if we are not prepared and think just any old person can jump in the yellow truck/dozer.

I am willing to talk about any of these issues if you have questions or concerns. Otherwise Happy Thanksgiving, and I do appreciate the work you have all been doing throughout this entire process, Thank you

#58_____

I'd like to provide a few comments on the proposed restructuring of specialty programs, specifically Urban Forestry (UF).

UF has made strides and gained recognition in the Division over the past years. I believe having four FLT representatives for our program has played a large part in this. Going to line supervision means there will only be one FLT member who represents UF. I have concerns that losing 3 FLT reps will result in UF losing the recognition we've gained over the past few years. Suggestions to overcome this loss of representation were made, e.g. a UF member attends FLT and/or FOT meeting(s), staying connected with the regional directors. My concern is…Is this enough? I don't want to lose UF visibility and representation.

I am concerned UF's connection to regional forestry will be lost. It has been refreshing to connect with all the foresters in the region. It's a two-way street: assisting each other when we need help, fostering connections between external program partners, tapping into each others knowledge and the friendship and camaraderie is great too. A regional connection must be maintained.

An argument has been made that the program leader will be a better supervisor b/c they know their program the best. The flip side of that argument is that the program supervisor may only represent their statewide view of the program, and not adequately understand or represent the regional staff's perspective. Having a regional supervisor does take those regional issues into consideration. If we do proceed in having a central office UF supervisor, it is imperative this person represents the entire UF programs and has STRONG supervisory skills, i.e. communication, leadership, mentoring…

Currently, the statewide coordinator position is already spread too thin. I worry their workload will dramatically increase, thus filtering down to regional staff. We are also spread very thin and this after already reprioritizing tasks.

An increase in these statewide duties and policies means the UF staff needs to be classified as "advanced" not "specialist". We've been performing at this higher statewide level for years and discussed several times getting our classification changed, but it's never happened. Now would be the time to have our PDs changed to reflect what we're currently doing and (I suspect) will be doing much more of in the future. Forest Health was recently successful in this effort. UF needs to follow suit.

#59_____

I have heard conflicting information on this point from FLT/FOT members - Is this a five year operational plan? If so does this mean we will be going through this process again in five years and redistributing staff again?

#60_____

Thank you for providing the opportunity to review and comment on the proposed Division of Forestry Strategic Direction Operations Plan. I certainly do appreciate the time and effort that has gone into this plan, and the hard decisions that have to be made as we move forward. I also understand that demand for our existing resources will continue to be increased in the future requiring that we prioritize our investment in order to achieve the

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most efficient and effective use of our limited resources. I get that and I applaud you for your efforts and dedication to move this organization forward!

With that being said, I do have a number of concerns and suggestions with the draft plan that I would like to forward for your consideration at this time:

1. First, I am concerned about the increased supervisory span of control and expansion of geographical areas proposed, specifically in the eastern portion of the state. Asking a field supervisor, specifically team leaders to supervise 12-14 people is unrealistic and inefficient. After reviewing the organizational charts and maps, it appears that many of the teams in much of Wisconsin are proposed to be staffed with 8-10 FTE per team; however in the Northeast District the supervisory ratio is more like 11-14 staff for each supervisor.

   The large geographic expansion of what will be known as the Green Bay Area and Lakeshore Area is of significant concern when other areas across the state are seeing little if any impact. As an example, the new Green Bay Area, which already contains one of the highest hazard fire landscapes in the state (FL7), and the second largest county forest, will expand to include nine counties, all three levels of fire protection, five fire landscapes, the Peshtigo River State Forest, Menominee Indian Reservation and some of the most contentious forest industry and cooperating forester issues that exist. Likewise, the Lakeshore Area will expand to 17 counties, making it nearly impossible for one Area Forestry Leader to do any kind of quality job.

   I believe at least one additional supervisor is needed to rectify this problem, either by creating a new area and/or by adding another Team leader to one of the above two Areas. Keep in mind that NER is already losing two Area Leaders, a Forestry Staff Supervisor and two Team Leaders as a result of this proposed plan. Please consider placing at least one back on the landscape.

   With the above concerns in mind I would like to make the following suggestions:

   - As previously recommended, northern Marinette County, specifically the resources stationed at Pembine should be placed back with other Marinette County resources and supervision. Marinette is one of the largest counties in the state. Maintaining the county intact as a team is critically important from a fire and county forest management standpoint. The geographic proximity and functional nature of work between Pembine and Wausaukee, not to mention close working relations with Marinette County Forestry staff, require these stations to work as a team underneath one supervisor. The two FTE and resources at Peshtigo could be combined with Wausaukee and Pembine resources to form a stand alone Marinette Team having 10 field staff.

   - Oconto County (4FTE), Shawano (3 FTE), and Menominee (2 FTE) could be combined into one team having nine field staff. A new Team leader position would have to be added in order to accommodate this, but could come from the vacant Peshtigo Team leader position. This team would report to the Peshtigo (proposed Green Bay Area) Area Leader along with the Peshtigo River State Forest.

   - One new area should be formed to include the nine counties of Waupaca (4 FTE), Brown (1FTE), Outagamie (1 FTE), Door/Kewaunee (2 FTE), Waushara (5 FTE), Winnebago (2 FTE), Calumet and Manitowoc (1 FTE). The two counties within organized protection (Waushara and Waupaca) should have a team leader assigned, with the coop county foresters reporting directly to the AFL. Net increase from draft proposal is one supervisor. However this still decreases number of supervisors from current staffing by one.

- The proposed Lakeshore Area would lose Winnebago Calumet and Manitowoc (3 FTE) which would be placed back in the Northeast District. This leaves seven direct reports to the Lakeshore AFL and reduces the number of counties to 14, still a large geographic area, although considerably more manageable than 17.

- Waushara County (5 FTE) would be removed from the Dodgeville Area /North Team and placed within the West Team of the new area as described above.

- The Dodgeville Area's North Team could be rearranged to include Marquette/Green Lake (4 FTE), Columbia/Poynette (3 FTE) and perhaps even pick up Dane (1-2 FTE).

2. With respect to fire management, one of the goals of the 2010 Fire Program Assessment and with this Strategic Direction Operations Plan has been to identify the highest hazard fire landscapes and to shift our limited resources towards these landscapes in order to focus our efforts and fire response in these critical areas. As you know, I have been involved with these efforts and have been through previous fire studies and program changes that have resulted in ranger station closures & consolidations, fire tower decommissioning, as well as the loss of fire equipment and staff within the old Marinette and now Peshtigo Area.

   What concerns me most is that, in spite of Fire Landscape 7 being in the top three high hazard landscapes, and in spite of being located in the far northeast corner of the state where we are geographically isolated from back-up support resources, we are taking yet another significant reduction in fire suppression resources. Not only is the geographic and functional area of responsibility for this Area increasing more than almost any other area of the state, Fire Landscape 7 is losing two type 6 engines, one tractor-plow at Florence, a forester/ranger at Pembine, forestry technicians at Florence and Wausaukee, a dedicated full time mechanic, and our depth of backup equipment operators is being reduced to zero. Additionally, another Type 6 engine and heavy unit currently at Langlade will be moved farther away to Antigo leaving a large response gap between Peshtigo and Antigo that we are trying to plug through some type of agreement with USFS at Lakewood. With those concerns in mind I offer the following suggestions:

   - Close the Langlade Station and aggressively pursue an agreement with the USFS for placement of staff and fire equipment at their Lakewood Ranger Station. Either the Type 6 engine currently at Langlade should be relocated to Lakewood instead of Antigo or the second Type 8 engine proposed for Oconto Falls should go to Lakewood and be upgraded to a Type 6. Either way, Antigo should retain two Type 6 engines or a Type 6 and an additional Type 8.

   - In the Fire Operations Team work, Oconto County clearly showed the need for two heavy units instead of one largely due to the needs of FL7. Therefore a second unit should be located in Oconto County, preferably at Lakewood once agreement can be reached with USFS. Only one heavy unit is positioned in Oconto County now due to limited infrastructure. During reconciliation it was recognized that the Langlade heavy unit is positioned where it is to serve that need, however the current plan shifts that heavy unit to Antigo and eliminates one Antigo unit from the fleet. In addition to moving the Langlade heavy unit to Lakewood Antigo should also retain a second heavy unit.

   - Wausaukee and Pembine will each lose a Type 6 engine. Two type 8 engines are proposed at Wausaukee. We do currently have two forestry trucks; however neither is outfitted to Type 8 standards. This would require an addition to the forestry truck fleet by one vehicle.

3. A full time WUI specialist is proposed to be stationed in Rhinelander to cover both Fire landscapes 7 and 9. The need for these specialists was outlined in the Fire Program Assessment; however that assessment also recommended that the WUI duties for these two landscapes could be covered by two people at two locations as long as their WUI time was not less than 50% each. I would recommend that this position be split accordingly between each landscape with 50% being allotted to WUI and the remaining 50% allocated to a new forester position. Within Marinette County, the forester workload allocation during reconciliation came out to 6.6 FTE but the county was only allocated 6 foresters. I would suggest one additional forester be added to Marinette with 50% WUI responsibility in FL 7.

4. For the Peshtigo River State Forest, the reconciliation team recommended two Ranger Operations/Enforcement positions, one of which would spend 50% time on FRLE. However, one was removed from the draft Operations Plan allocation and replaced with a supervisor instead. I am concerned that the FRLE duties will not be adequately covered due to this decision and suggest that the ranger Enforcement/FRLE be placed back within the PRSF for this intended purpose.

5. Lastly, as we reduce the amount of fire equipment and the number of field staff available to operate that equipment, it will be critical to ensure that all fire equipment is operational and maintained in a safe and fire ready condition. Our mechanics will need to play an even more important role and will need to spend more time on preventative maintenance, and addressing breakdowns as they occur. I'm concerned that the proposed plan, by making our mechanics primary operators of fire equipment, may dilute the required competencies, and reduce the available time these employees will be able to spend on this critical work, particularly during the peak of fire season when our equipment is operated long and hard. I don't have a solution other than adding more technicians or mechanics but ask that this concern be discussed with Fleet to pursue additional resources that the department can add to this already valuable investment.

#61 _____

The forestry program would suffer greatly should the forest lose VSA positions. It is vital to providing the efficiency needed to streamline workload so the professionals at the office can focus on the forestry and recreation aspects of their positions. The revenue of the timber sales alone were over $1,000,000 this past timber sale and the position is needed in order to handle all the timber sale administration necessary for remittances. An LTE has put in hundreds of hours to complete the administration. These are hours that do not show up on an FTE time sheet and have in turn has avoided a great deal of remitting workload for the Senior forester (in other aspects of invoicing) so he/she can focus on meeting the allowable cut expected. This is just one portion of the workload and does not include all of the recreation fees (approx. $30,000 for 2010), remittances, sticker accounts, invoicing, LTE hiring, contracting, office management, purchasing, capital development projects (average $600,000 worth this year alone). The property budget for this year's operations is close to $260,000. That is approximately $1,630,000 worth of revenue that goes through this position for processing. There are aspects of this position that don't have an activity code such as the land acquisition; we have approximately 60 land use agreements that need to be developed. This portion of the program has been ignored with only 1/10 of them being addressed.

I realize that these responsibilities could be reallocated to permanent staff, but it will certainly slow down production and efficiency. Or some could be assigned to LTEs, but there tends to be a high turnaround with that route and the training and time necessary to become proficient in all these areas should all be factored into this decision.

Plans are being drawn to build a beautiful new office for over $2,000,000 to help increase visitor services and yet there will be no position allocated to keep the doors open. What about customer service? This building is located to become a major intersection for snowmobiling, ATVing, canoeing, and highway access. Showers are

planned that will increase camper visitation along with a planned environmental building. It just doesn't make good sense to me that the hub (the visitor services associate) be removed.

Thank you for listening and I hope you will push to keep this position at the State Forest.

#62_____

Thanks for sending us the ops figures. I understand there was allot of work completed in a very short amount of time. Data collected for the Operation portion of the plan may not have been verified which I understand. I did go over the figures for the State Forest and have a few comments for the reconciliation team to consider.

Recreation on the Flambeau River State Forest

Water Base Rec. - Figures used may be in error. The rec report shows fewer landings and canoe campsites. I noted differences in how properties reported facilities was not consistent and may or may not make a difference.

Trail figures - This one has me a bit stumped. If two forests are comparable in mileage how can we explain the different maintenance figures (2,542 hrs vs. 800 hrs)?

Access - Only one property has an access plan and has 150 gates and approximately 200 berms. This aspect of the forest is an important niche unique to the forest - implementation of the access plan and maintaining the remote/backcountry atmosphere. Both with the maintenance and law enforcement associated with illegal ATV traffic is a major workload and 40 hrs for maintenance and 24 hrs LE are unrealistic figures. Not sure why another forest got 250 hours assigned.

Development projects - Again not sure how hours got listed so low. My biggest concern is with the hours associated with proposed facilities. With the completion of our master plan we have approximately 90-100 projects proposed. In the short term the biggest projects involve completion of an additional 15 miles of ATV trails and major renovation of the existing 35 canoe sites and addition of 7 additional sites. Cost and project summary available if needed. Time allocated to this forest and other State Forests needs to be reviewed

Maintenance Roads - The miles listed are in error. Fully developed roads (20) is correct, however moderately developed should be 40 not 20. There should be some clarification on lightly developed roads. If periodic mowing is completed, time and cost should be addressed. If there is no maintenance do not include. The Flambeau is unique from the other State Forests as it relates to our infrastructure. Again it is a unique niche of the forest

Forestry

Looks like hours for forestry is 7,718 hrs for foresters and techs. I am hoping this will work. We should be close if we have qualified individuals doing the work. This is where I caution FLT as it may not happen as quickly or at all. We are working with a wide variety of employees with different interests and passions. Many times regardless of our best efforts putting a person doing a job out of their capabilities turns into a liability. This problem is going to be at different degrees across the State.

VSA

VSA position has become very efficient in carrying out a wide array of support (forestry, recreation, LE, land control, etc.) and losing this position would have a major impact to the efficiency of the program. If these responsibilities were put on other staff the performance of the operation would be hurt considerably, and time and cost would increase. The question has come up if this work could be done with an LTE. This was tried for a number of years. Turn over and retraining was high and productivity was low. LTE's look at the position as a stepping stone and in most cases move on to a better higher paying job. Average time for our LTE's is about 2 years. Cost comparisons of using an LTE verses our existing VSA are also not there. If we were to hire an LTE to do the same job @ $12.00/hr for 2080 hrs it would be $24,960.00. Our present VSA works 3/4 time 1,565 hours @15.00 for $23,475.00. There is no cost savings only a loss in efficiency and

effectiveness of the position. Our VSA is critical to maintain, please consider these point in the maintenance of this position.

#63 _____

Strategic Direction Feedback for Iowa County

In Iowa County two positions are currently filled and there is a vacant position. It is proposed to reduce the office to one forester. The county is handled only out of the Dodgeville office and most forested land is within a 15-20 minute drive. There are several factors that need to be considered making an argument for improved efficiency and continued program delivery.

Given that the maps and charts show that 60% of the work in Iowa County is in Private Forestry with about 45,000 acres in MFL, reducing the number of FTE positions for this high priority workload by 2/3 in the main office for the program, would significantly impact the service the for landowners of Iowa County and reduce the efficiency in a large MFL workload by moving work to other offices. There are also aspects of the workload that are underrepresented.

The work done in the southwest is more time consuming. This part of the state is unique when compared with at least the upper 2/3 of Wisconsin with respect to the timber markets and challenges we face when trying to carry out silvicultural practices. Many of our timber sales require non-commercial cutting of small diameter trees to accomplish our objectives. The silvicultural complexity is arguably the highest in the state with the highest value species represented. Our timber types vary significantly based on slope and aspect as well as the varied past management. All these factors add significant time in all of our management activities. We have very few harvests where areas are designated rather than individually marked since we have very few large aspen stands and no jack pine or swamp conifers. Based on cover types alone and the sometimes incredible demand for black walnut, we spend a great amount of time evaluating and correcting cutting notices. Some log buyers will still blatantly high grade stands if they are not working on MFL and will try to push limits of sustainable forestry when working on MFL lands. These factors, coupled with the steep topography, makes sale approval and BMP monitoring more time consuming than other areas of the state.

Also underrepresented in our workload is the lack of professional foresters working with MFL landowners. Currently there are no cooperating foresters residing in Iowa County. This lack of professional forester presence over the years makes it difficult to convince landowners to use a firm with a cooperating forester on staff which increases our time when administering and approving cutting notices. Furthermore, the historical lack of sustainable forestry practiced in challenging oak and central hardwood silviculture, makes the professional forester involvement with field time for stand prescriptions more important. A quick sample showed that 18 out of 39 cutting notices in our MFL cutting notice files were marked by a cooperating forester with the balance marked by a logger or timber buyer requiring much more administrative time. Without a majority of the timber sales being marked by cooperating foresters, there will still be a great deal of time spent approving cutting notices for sales marked by loggers and timber buyers.

The WFLGP program is a workload that may be understated when we are reporting our accomplishments. Currently there are 108 applications or funded grants on file that are active in Iowa County. There is a certain percentage for MFL plan development that do not require a great deal of work, but the majority of the practices require a field visit with tree marking and/or landowner follow-up on project progress or questions from landowners about treatments. Iowa County also has a large number of landowners spending significant time and money working to control invasive species, which requires our attention to make sure WFGLP program dollars are being effectively utilized.

Based on the current program needs for improve efficiency, continued program delivery, and the underrepresented work, there are a number of alternative solutions.

The proposed plan has Iowa County being shared by four different foresters in three locations. However, there is a great deal of time savings realized by keeping records and landowner relationships in the same locations with the same staff. The simple question from a landowner, who has been serviced by the same staff for years, may be easily answered with a phone call. With new staff handing the same landowners, there will be additional field visits and time invested. In addition to the institutional knowledge base, greater efficiencies are realized keeping foresters in counties where there is a larger workload. Keeping two foresters in Dodgeville will continue this service.

Grant County could be serviced out of more than one office for the following reasons. Grant County is geographically large with the majority of the woods located a longer distance from the office with a lower MFL acreage compared to other counties in the district. Many of the forested acres are located closer to offices other than Lancaster or within easy working distance to Darlington, Boscobel, Dodgeville, and Spring Green. With lower MFL acreage, there is less time in the field, with office work that could be handled in any location.

The state land portion of our work could also have improved efficiencies. It could be argued that it makes sense to have less people involved in the day to day activity of administering state land, with foresters and technicians located around the district available to set up the timber sales and do the field work to update recon databases. The office work could be handled by fewer people who would become more efficient at handling our WisFIRS system and working out the necessary processes involved in getting approval for timber sales from property managers with varying goals. Silvicultural decisions would still be handled on the ground by field staff if necessary, but any changes to recon or harvest dates could be relayed to someone with an administrative role.

These changes to the proposed plan would improve program efficiency, maintain the current service level and minimize the impact on employees.

#64 _____

Work that was over looked in implementing our strategic direction which is specific to the Dodgeville Area and the Lower Wisconsin Riverway, is that we have a statutory responsibility to work with the Lower Wisconsin Riverway Board and administer the Lower Wisconsin Riverway Law. This work is in addition to normal state lands timber sales work. It requires a specific expertise, unique partnerships, building and enforcement across state and private lands in 7 counties on the 72,000 acres designated as the Lower Wisconsin Riverway. This work, similar to that of a county Liaison, accounts for 50% plus of the Lower Wisconsin Riverway Forester. A portion of the LWSR tasks are related to LWSR permits that need a quick turn around time and the need to be able to respond quickly to LWSR Board requests. This work is required by statutes.

Having to meet this statutory responsibility will require additional resources to be shifted into Iowa County. To more efficiently meet the work load need, we are recommending moving the Grant County forester position form Lancaster to Dodgeville. The Lafayette County forester would service both Grant and Lafayette counties. As already has been identified the Boscobel Ranger and Technician will also cover private lands work in Crawford and Grant County. Having two forester positions in Dodgeville would allow us to more efficiently meet current and future priority work load in our highest workload counties.

A side benefit is that this will reduce disturbance to staff since this is how we are currently covering the Lancaster vacancy. This coverage plan has been working well and staff are willing to make it a permanent solution.

#67_____

I am having a difficult time reviewing the allocation of resources without the benefit of knowing if it was FLT's intent or something was overlooked given the level of information that was provided.

However, I do have questions about the allocation of LTEs in the bureaus. Just in the last week I have had one person tell me only forestry money was considered while another indicated that federal or other money was considered. This is critical to know before I can begin to comment on whether the allocation will address intent statements. So I offer the following with some hesitation, I believe we have limited our capacity, as outlined in the org chart, in LTE support for Forest Health, Forest Genetics, Industry Development, Forest Hydrology, Silviculture/Ecology and possibly State Forest.

I appreciate the attempt to balance the districts from a personnel standpoint and I agree this largely drives the difficulties you were trying to address more so than geography. I wonder though have we created, geographically, to large of a Southern District? I would have strongly considered five districts. Although this would have added another supervisor to the mix you could have realized even more balancing of personnel throughout the districts in addition to realizing other benefits.

While we ask more folks to take on more responsibilities I worry we may end up less effective in delivering programs. Jack of all trades, master of none. Are we talking out of both sides of our mouth when we want some folks to do more program (integration) but on the other hand LE needs to be consolidated to a few to become the expert and proficient. If we are ok with a little less effectiveness what is proposed can work.

I believe we are banking on MFL efficiencies that will be difficult to obtain. Even if they are obtained it is one program where the growth of the program should have been taken into account. In the perfect scenario, after five years efficiency will be largely offset by growth. Look at the new boss same as the old boss.

I appreciate your hard work on this, it was and is needed…Good work.
Please stop using the phrase “bench strength”

#68_____
UF LTE's
As I look at the new Division and urban forestry structures and the number of LTE's listed, I would like to strongly advocate for a second LTE position in both Fitchburg and Green Bay. The work load study done in the early 2000's showed the need for a second full-time position in each area and the workload has not decreased. With the new strategic direction, additional capacity is needed to both meet core work and to build the tools and connections to work into the canopy model concept.

We have excellent LTEs currently in place that would do well as full-time equivalents (two LTE positions). I'm not sure on how the discussions have gone with location and numbers of LTE's, but please consider these more targeted needs as well. These positions greatly increase our capacity to meet mission and connect with our customers in an efficient and timely manner.

#69_____
Clarification on State Forest LTE number…I have had some conversations and gotten some clarification at the “water cooler” but would still like to submit as a formal comment for clarification.

Two needs for clarification:
1) It’s not clear what the org chart is showing in terms of whether there is no change in the number of State Forest LTEs and there is an error, or if there has been a change in the # of LTEs.
2) Another source of confusion that I have gotten conflicting answers to is whether the org chart is showing ALL LTEs or ONLY LTEs that are funded with Forestry dollars.

current set-up (filled positions):
1 FTE

7 LTE (1 LTE = 1040 or 20hrs/wk)

Of those 7 LTE this is the breakdown:
2 funded with Forestry $
5 funded with other dollars (Facilities & Lands; planning)

So, of the 5 LTE on the new org chart, which positions are these and is it a decrease from the existing 7 LTE, or an increase from the 2 LTE that are funded with Forestry $? This is confusing to me because I'm not clear on how the LTE positions funded with other sources were factored into the analyses.

I understand that the strategic direction identified a decrease in planning which is primarily a CO LTE function. So I am not necessarily advocating that the number of LTE is wrong or right, I just wanted clarification as to what the number represents.

I am also curious if a discussion occurred related specifically to the State Forest CO program and whether FTE positions were considered?

#70_____

I believe that with the implementation of the Strategic Direction a few vital positions have been overlooked on the state forests in general. The visitor service associate positions are vital for customer service and the success of a well oiled office. On the this State Forest, the visitor service associate greets customers on the phone and in the office with a smile and helps them obtain information about almost everything from hunting and fishing regulations, to information on good hunting spots, to complaints. Not only does this position take good care of the customers but with her present it allows the forestry staff, supervisor, and LE rangers to continue doing their work uninterrupted. With the constant buzz of the phone ringing or people coming into the office a day productive day in the office can be ruined for the staff. The position also balances the state forest budget, takes care of our p-card purchase and other purchases, does invoices, calls loggers about payment schedules, does scale slips, takes care of audits, keeps track of money for stickers, firewood, etc. The position helps all staff do the work that they do not have time to do. I know for a **fact** without this position, the timber sale establishment and administration would suffer. Right now the Forest has to establish about 2800 acres, more than 90% of that is northern hardwoods that need to be marked and it takes a long time to get line around these areas. During the winter on average there are about 10-20 sales actively being harvested. In closing, we need a VSA on the Forest to be able to operate efficiently and effectively.

I have concerns about the new position that was created on State Forests to handle Law Enforcement (timber theft, fire, etc). I think that this might be a good fit for the Forestry Staff Specialist. In my experience with the DNR I have noticed that across the state the Forestry Staff Specialist seems to have a lot of spare time. I guess I am not sure what that position does. The Forestry Staff Specialist positions seem as though they are placed strategically throughout the area and it would be a better placement then on the state forests. We need to have consistency with our law enforcement and I agree that not all the rangers need credentials. I do not agree however that it is necessary to have **3** law enforcement positions on this Forest. I do not think that we need any more law enforcement. What we need is a position that would help with the operations of the forest.

I am disappointed that the strategic direction and ops plan did not discover the need for at least one additional forester position on the Forest. This is a very large forest and our allowable harvest is huge. Not only is it huge but the majority of the harvest is northern hardwoods which takes more time to set up and mark. I will make a comparison in case this has not been realized.

> In one day a forester can mark 10 acres. In one day a forester can setup 50 acres for a clear-cut.
> It will take 10 days to mark a 100 acre sale. It will take 2 days to setup a 100 acre clear-cut.

#71_____

The addition of a partial FTE allocated to Conservation easements is appreciated, has been necessary for a long time. Current staffing of conservation easement work is done by 1FTE and 2 LTE. The proposed org chart only

shows 1 LTE with the conservation easement position. With a addition of a only a partial FTE position to ease workload, both conservation easement work and private forestry, there are concerns that more than one LTE will be necessary to ensure that the state is able to meet the monitoring requirements and manage workload without a minimum of 2 LTEs under the Conservation Easement position to make up for the partial time spent working on the Private Forestry component of the PD.

There are still widespread concerns over what 'missing positions' and what that means for that individual currently working in that position. Guidance provided is general and doesn't address individual concerns.

#72_____

1. CO structure - Bureau of Forest Management.
   Functionally align urban, forest health and nursery in one section.
      Rationale - These programs have a great deal in "common" including, direct line to field staff and providing services to internal and external partners.

Observation - 3 of the big 4 programs (big 4 defined as where the majority of field integration occurs and where the majority of resources are invested) are in 1 section.

#73_____

In the early 2000s FLT allocated dollars and positions for 2 UF FTEs for the NE and SC Regions. The Secretary at the time removed the positions but the dollars were kept in the UF budget. FLT recognized the large UF workload in these regions ten years ago. The new Ops org chart indicates 4 LTEs for the UF program. I would like to strongly advocate for a second LTE position in both Green Bay and Fitchburg locations. With the new strategic direction, additional capacity is needed to both meet core work and to build the tools and connections to work into the canopy model concept. We are making great strides to analyze the urban forest on a metropolitan scale using i-Tree. We are also reaching out to new and exciting partners to help us further stretch limited dollars to better manage the urban forest. For us to continue on this track plus take on other statewide duties we need additional help. These positions greatly increase our capacity to meet mission and connect with our customers in an efficient and timely manner.

Currently, the statewide coordinator has a full workload. Adding supervisory duties will make that position impossible for one person to do. This means that statewide duties will trickle down to the regional coordinators causing our already full workloads to increase. How are we supposed to do what is in the Strategic Direction and take on statewide duties?

Please take a look at the regional urban forestry coordinator's classification! We are not specialists anymore, we are advanced! We have statewide duties already and these are only going to increase. Forest Health has done it, Urban Forestry needs to do it too.

There are pros and cons to having all UF staff supervised by one person. Supervision and annual work goals will be more consistent then it has been in the past. There is a concern that we will focus more on statewide issues and not on regional issues. An issue in one region isn't necessarily an issue in the others. The regions are not the same.

My current & previous supervisors have the skills that have helped me accomplish what I was originally hired to do. I believe that an effective supervisor needs a certain skill set like coaching/mentoring/interpersonal communication/leadership skills. If I need help I want to be able to go to my supervisor to talk about it.

I do not want to lose UF program visibility and representation on FLT and FOT. UF has made strides and gained recognition in the Division over the past years. Even after the new supervisory chart is put into place I still plan

on talking with my current FLT/FOT reps about UF issues. I will strongly encourage my regional counterparts to do the same.

I appreciate your openness to comments and suggestions and appreciate your consideration.

#74_____

Attached is a spreadsheet on which I've calculated the impact of the SD staffing plan.

The bottom line is that I think it can work as is, **but that will depend on full staffing of the Teams (12 FTE)**

My reservation is that the Division intends to maintain 10% vacancies. With 12 on a team, we could mathematically expect to maintain an average of one vacancy. This is also logical within the five-year term of the SD Plan, as I can realistically expect three retirements. Even if it is intended to backfill the retirements, the time lag associated with the process will insure that I am not fully staffed.

Note: I've used 1705 hrs. as the base per FTE for the "Big Four" in the integrated program. Apparently 115 hrs. per FTE was allowed for miscellaneous. I disagree with the 115 hrs., feeling it is not adequate to cover all the tasks that are supposedly included. The additional miscellaneous at the bottom of my sheet, covers what I feel is the shortfall in the SD miscellaneous allowance, plus additional tasks that I've not included in my goals, such as contributions to other programs.

Bottom line: If we can enjoy full staffing, 12 FTE Teams will work but if there is a 10% vacancy, we need to have 13 FTE Teams.

#75_____

I would like to comment on the differences in the numbers of fires dispatched each year by the proposed dispatch centers. Using the Individual Forest Fire Reporting System (IFFRS) I looked at the last 15 years of data (1995 to 2010) for each of the proposed dispatch areas and the results are listed below:

Dispatch Center	Average Fires per Year Dispatched	Average Acres per Year Burned
Brule	104	304.48
Cumberland	117	194.10
Black River Falls	139	362.67
Park Falls	150	244.18
Peshtigo	239	351.46
Wisconsin Rapids	243	617.99
Woodruff	246	212.43
Dodgeville	316	1175.90

When I looked at the results I see a huge difference in work load between the dispatch centers and maybe not the most efficient and effective use of our personnel in these positions. If we are going to eliminate a dispatch center, I believe we should be looking at which dispatch centers have the lowest number of fire dispatches a year and look at combining them in a way that will even out the work load between all the dispatchers. I do understand that Dodgeville does not have fire towers added in the equation and thus should be able to handle a larger number of fires per year, but I don't believe that means over three times the number of fires a year compared to Brule.

With the proposed dispatch area layout I believe that on those multiple fire days we have in the spring that some of the dispatch centers, that dispatch the larger amount of fires per year, could start to become overwhelmed with tasks. Once that happens the ability of the dispatch group to rapidly respond to and suppression forest fires is affected.

#76_____

I would like to comment on the proposal to create three additional full time WUI positions. I support additional investment in the WUI program; however I am not convinced that adding coordinators over broad geographical areas is the most effective way to enhance our WUI program. To maximize the effectiveness of that additional investment please give further consideration to dividing those WUI responsibilities among several Rangers that are located within those high hazard landscapes.

The local Rangers are familiar with the local hazards and areas of greatest concern. They are already interacting with key players such as local government officials and fire departments and are highly regarded by the community for their knowledge of wildland fire lending a lot of credibility to their assessments and suggestions.

Local Rangers have an unparalleled stake in the outcome of the WUI program. Primarily because they will be responsible for protecting those interface structures, but also because they are themselves a local resident of that landscape and community.

I believe that incorporating WUI responsibilities into some of the Ranger PDs could also result in a WUI program that is much more integrated with the field. Currently I don't sense that integration.

I am confident that there are Rangers who would welcome the opportunity to be more involved with WUI efforts within their fire landscape and would do an outstanding job. Rangers have historically taken ownership for not only suppression, but preventions, LE, and interface issues within their landscape. I think that removing any of those aspects of fire control and placing them at a broad or statewide scope will reduce the overall effectiveness of those aspects of the program.

#77_____

Reducing the foresters from 2-1 in Pembine is a huge oversight. There is a large MFL workload, including Coleman Lake Club lands. A large FRU and a state lands workload. This is way too much for 1 forester to handle. You would need the Wausaukee forester to take over some of the MFL (such as the Amberg township which is a very busy private lands township) Even still, that still would not be enough to reduce the workload for the remaining Pembine forester/ranger. I do not understand how the current Wausaukee team can lose 2 personnel. Where did those positions go instead? If DNR is not losing positions, I see no reason to lose 2 positions here. If there is 1 vacancy there will be no way to cover it for any length of time. We have had quite a few vacancies in the Peshtigo area so we are familiar with covering for vacancies.

Wausaukee Forester's new Fire Role I do not know the specifics on how fire duties will be incorporated into the Wausaukee forester and Wausaukee liaison position. The current system of having a ranger and a supervisor who can fill in as ranger has worked great as you have 2 experts doing the job. Now you will have 2 slip on units with foresters who, while have training, will need much more training and experience to be able to be the IC on fires the Wausaukee area which has extremely high potential for catastrophic fires, especially with the incredible about of urban interface. It seems like a very poor move from a public safety aspect. Folks are more efficient when they are more specialized in what they do. We are already a very integrated team but the increased demand on fire will make things difficult. Spring fire staffing at an increased rate will make my job more difficult to accomplish workload. What workload reductions will be seen in the Wausaukee forester position? The tech that used to assist with private lands and tree planting in the spring will no longer be here to assist. I fear this idea looks good in concept but it does not work well on an operational level. What does it do to accomplish better public safety? Will the current Wausaukee Ranger's role in fire be maintained at the same level or decreased? The direction states that in fire you will have more individuals involved in fire doing less overall work in fire. This statement and how the strategic direction lays out foresters with slip-ons means more personnel in fire with an increase in folks who are not as well trained. The strategic direction shows reducing the amount of

credentialed folks as you want fewer people who can specialize in enforcement which makes sense but in fire you want the opposite.

Reading the following line taken from the FAQ's on the strategic direction "The basis for protective retirement is the likelihood that an employee will not be physically able to protect the public for the length of a normal career" That would then mean the foresters in Wausaukee who are required to have a slip-on would then be protective as they are asked to do everything a ranger is asked to do including staffing shifts.

Splitting Marinette County between 2 Areas The Pembine office and Wausaukee office are very integrated as they share workload on the Marinette County forest. I have big concerns seeing these 2 stations under 2 different supervisors, much less in a different area. If the supervisor of the Pembine crew has different work priorities than the Wausaukee supervisor this could result in issues. Keep Marinette County under the same area and keep Pembine and Wausaukee under the same supervisor. Splitting this makes things much less efficient.

Why not give the Green Bay area Northern Marinette County and give the lakeshore area Door and Kewaunee Counties? This makes more sense from a geographic perspective and organizational perspective. (You can't get any more lakeshore than door county…)

Mechanic with fire responsibilities I hope it is understood that a mechanic with very active staffing responsibilities will have a reduced ability to work on equipment in the spring. This will be an issue when fire activity is the highest and that mechanic job is all of a sudden most vital. Mechanics often need to travel to fix equipment or devote full days in the shop with short turn around times needed. If equipment needs to be shopped out for work then the costs go through the roof compared to our mechanics doing it. This is a limitation that I have concerns with.

Losing a Forestry Tech in Wausaukee Beyond the ranger being lost in Pembine, there is a tech eliminated in Wausaukee. It should be understood that the remaining forestry tech will have to help the mechanic, have an increased role in fire, assist on the county forest, and likely no longer help on private lands forestry. This tech will not be able to accomplish what the 2 techs used to do. Some where workload will need to be reduced on whoever needs to pick up this extra work. While I would rather not see a tech lost at Wausaukee, losing a Pembine Ranger is a bigger issue and one I addressed above. There is plenty of work for 2 forestry techs (beyond the mechanic) but the main issue will revolve around fire staffing. I still don't understand why one of the most at risk fire areas in the state is losing 2 fire personnel.

#78_____

I have several concerns. Some of my staff have submitted comments now that there is something substantial that they could comment on and have received replies such as "Thanks for your input. It will be taken into consideration." I hope you are REALLY (emphasis added) going to consider those comments from veterans of the Division of Forestry. Their "boots on the ground" experience IS about the Forestry mission and not necessarily retaliation to change. The timeline that was given for comments after the Ops Plan was release was far too little in my opinion if this is truly the drop-dead-deadline for input. The feeling I get from my staff is that the Ops Plan and organization charts and staffing decisions were made by FLT without much input from the field.

So, that being said, I believe FLT and the "bucket teams" made a serious error in the value, need, and type of work demanded of the Forestry Technician classification. I have heard that more of our future work will be "professional" Forester classification level workload. I submit that the actual boots on the ground work by Technicians is and has been allowing the Foresters to do the many "professional" level accomplishments we have seen over the years. By elimination of Technician positions Foresters will be required to allocate more time to those functions which we still will be doing, though maybe at a reduced level, and will reduce "professional"

level accomplishments. Accomplishments by both Foresters and Technicians are crucial to meeting Forestry's mission and the overall safety of both staff and the public we serve.

Specifically, in our Team I believe there could be reduced productivity due to the proposed reallocation of resources. We are adding in the portion of another FRU, which currently includes a Forester-Ranger and Technician position. That would bring the total on the our Team to 15 FTE's up from the current level of 13. There is also proposed an additional Forester to help to try to meet the large private forestry workload in our County. That would bring the total to 16 FTE's. (Not exactly a manageable supervisory to staff ratio.) Then the Ops Plan says we will eliminate three Technician positions, two in one County and one in another County and one Forester-Ranger position. So, the proposed total FTE's for the team will be 12, a net loss of a position. The caveat of having support from the other programs to staff a unit during fire season DOES NOT equate to the level of work accomplishment by the Technician position being lost. It will cause reduced effectiveness by the Forester-Ranger position let alone the concerns for public safety. In addition, it will cause losses in production let alone the supervisory conflicts and issues that could arise. I know some of the staff and supervisors also have serious concerns of the effectiveness and efficiencies that will be lost due to this plan.

Bottom-line, I do not support the Ops Plans "as is" without further input and discussion from the field staff. I am supportive of changes that are well thought out and have potential success just like any good game plan. I'm hoping that we are currently still in the "pre-season" part of the full implementation of the Strategic Direction and that the leadership will be open to more discussion on this plan beyond the limited deadline of today. I certainly will be forwarding additional thoughts as I have time and hope they will be adequately considered.

#79_____

I am wrestling with the new Forestry organization chart. The State Forest Assessment does a good job in charting out needs on pages 10-14. The assessment also points out another 0.4 FTE in Area assistance and 0.6 FTE in Supervisor Forest Land Management. I thought supervisors were not considered for fieldwork load direct assignment.

The potential future loss of a VSA would have a huge impact on our ability to process the annual stumpage plus permits, performance bonds, contract administration, office operations, etc on this property. The fact that the Operations Team neglected to include administrational support FTE needs to be remedied. We need consistency and continuity to our Forestry program that this position maintains. The spreading out of the Forestry workload to other Teams does not add to the office operations and financial responsibilities that currently are sound, accurate, on time and handle a very large amount of monies. The help consists of advertising, bidding, contract writing, prospectus, filing, billing, ledger and journal entry and close-out preparation. This support is crucial to continuing our high level of Area and State Forest forest management. Please see that we have the tools we need to function well.

I am also concerned about the vacancy rate on the Foresters positions and the new chart's loss of positions to be spread out to numerous foresters in two counties. The State Forest, Forest Management Assessment stated we currently have 9.4 FTEs (plus 2 LTEs) of staff to manage our forestry obligations. The new organization shows ~6.8 FTEs under my supervision for forestry work. Does this mean we have 2.6 FTEs of outside help in the District to accomplish work goals? I would like to think that our VSA FTE, clerical support would be one of those positions brought back in the new NHAL organization. I know contracting will help, but I can't see that much help coming from foresters in small %s by each forester or tech. It would be helpful to have a discussion of what positions are committed to SF workload and how many hours or acres are required to get it done. Currently we have 5 FTE foresters on the Forest and hopefully we get one from the hiring process. It will be a challenge to make goals without this help.

#80_____

In regards to question #1: What work that is important to our ability to implement our Strategic Direction have we overlooked? Please explain why the work is important in your opinion.

My response is that I think you may have overlooked the law enforcement needs in the NED especially concerning the Green Bay Area. There is only 1 LE hybrid position for the whole area, and it appears that person will have responsibility from Wausaukee to Appleton including Door County, and that's a large area. This person may be constantly on the road, and trying to juggle time on the Peshtigo River SF. I would recommend that 2-3 forester positions retain their forester ranger credentials in order to adequately provide LE coverage to the Green Bay Area.

#81_____

First, I congratulate you on this plan. I didn't think you'd pull it off, but you did. And it's a good plan. There are a few things I particularly like and I will offer some suggestions for improvement for you to consider.

I support conversion of tech positions to foresters. Recognition of the professional level of forest management work being done by techs is important and I think when things shake out we will attract a different kind of tech, developing a career track for foresters. It seems like there has been a bit of recoil by techs that feel this means they won't be doing that high level work anymore "more dozer time I guess". My encouragement might be to emphasize that it isn't a case where less is expected of techs, but rather that more is expected of foresters.

Closer to "home", I am pleased to see the consolidation of law enforcement duties and hope that this structure eliminates LTE rangers. After a few conversations with another Superintendent and FOT members, my suggestion is that these FRLE roles and responsibilities be distributed between all the rangers rather than only a few. My goal is to avoid creating "second class citizens" of our current law enforcement rangers. I would prefer to see that each of them is capable of all the duties and supports the law enforcement program in the area.

The property is also planned to have a Ranger-Assistant Property Manager and that role is a bit different and more specialized here, and possibly at other properties with them. While that position would need credentials to complete their job I think it is a different job from a Ranger and in my mind it's a different classification all together.

The Operations plan for Recreation and Law Enforcement works for me and I believe we can get our work done and also support others in the Area.

The part of the plan that gives me the greatest concern is in the Forest Management program. I will leave it to others to provide you the figures about acres and hours and etc. And I am sure you will get those. I would rather discuss the less mathematical challenges I think we will face with the proposed structure.

The most troubling thing in the plan for me was the absence of a Visitor Services Associate (or equivalent support person). Of all people on the property, our VSA in the forestry program would be the hardest to be without. The role they play coordinating the finances of as many as 100 sales is crucial to our operation. While a smaller property may be able to perform this function with a forester or two, here we may have a company writing us checks for sales that four or five different foresters are administering. Consolidation of that financial tracking makes sense here. It makes our foresters more efficient at what they do best.

Additionally, The VSA also provides customer service to the Recreation program and the data that left the planning team included about .25 FTE of VSA time to be performed at our Headquarters. This is the traditional headquarters for the property and many people go there for information. Many publications list this as the main phone number for the property and the person filling that role now takes a lot of calls to answer general property questions.

We have accelerated our establishment over the last five or six years to meet goals and eliminate backlog. For much of that time we've had a full staff. And we had assistance from the area. Concurrently we were using LTEs to assist with establishment and perform recon. In our scramble to meet goals we set priorities and those were frequently to get the "low hanging fruit". We are left with sustained high goals for establishment and a reduced staff on the property. I've discussed with the Area Forester where the assistance will come from and what work has been eliminated to enable them to assist us. It is unclear that there will be significant time available in the area to replace the lost foresters on the property.

Of course, the answer to this problem is to contract. I can accept that to a point. We will use contractors to perform a wide range of establishment activities. However optimistic I might be, I do not see a successful outcome. If I am going to manage this forest resource under the public scrutiny that I face, I need foresters working with those contractors. The public relations fallout from a particular sale as a result of a bad contractor once again gobbles up my time, the forestry supervisor's time, and the forester's time. I use many contractors on the property for activities that range from digging holes to hauling garbage. We have it figured out. But even digging holes requires oversight.

My firm opinion is that to operate our forest management program in a way that serves the public and the resource we need:

- A Forestry Program Supervisor
- A Visitor Services Associate or equivalent
- Seven Foresters
- Forest management assistance from the Area and from Mercer.
- Contracted services where and when they are appropriate.

It's your call and we'll do the best we can with what we get but I really feel I'm being set up for failure unless we get everything on that list.

I understand how difficult this exercise must have been. You must be getting many pleas for changes to the plan. I hope that you will consider the few minor changes I've suggested, which could be accomplished by adding a program assistance person to the property organization as planned. We started this exercise with 28 FTEs and lost one so far. I'd just like to end up with what we started with. Considering that state lands was supposed to be a priority, and considering the profile of this property, I don't think that's asking too much.

#82_____

Kudos – Unfortunately you are not asking for comments on what is RIGHT with the plan, but I feel compelled to tell you anyway.

1. The centralization of supervision and leadership of the specialty programs is brilliant. Yes, it will create workload distribution issues and we will lose the input of field supervisors which has been extremely valuable, but the efficiency of supervision, the consistency of program delivery and performance measurement, and the effectiveness of the team at addressing the new SD will all be enhanced.
2. The establishment of a new Urban Forestry Partnership Specialist FTE will be instrumental in transitioning to and succeeding in implementing the large scale impact intent of the SD. Recognition of this as a key, on-going core function of the program is greatly appreciated.
3. Incorporation of Urban Forestry into the new FIA Specialist's responsibilities and dedicating an LTE to focus on UF inventory and assessment is also brilliant. With urban FIA being such an evolving field, working together to address inventory and assessment of <u>all</u> the forests of the state will allow both traditional and urban FIA to learn from each other and will make contracting for data collection and analysis far more efficient and effective.
4. Maintaining the Urban Forestry Grant Manager FTE position recognizes not only the critical importance of the grants as a tool to accomplish mission, but also the need to devote the necessary resources to

accomplish the new Strategic Direction's complex task of continually adapting the program to efficiently influence the most urban forest management across all ownerships and jurisdictions.

5. Committing two "permanent" LTE positions to the central office UF program recognizes that the centralization of supervision will create a need for high-level ongoing staff support, and specialized internal and external communication capacity regardless of the future of federal urban forestry funding. This recognition from FLT is a gratifying show of support.

What work that is important to our ability to implement our Strategic Direction have we overlooked?
The critical work in urban forestry at the level that best fits the DNR's niche has been addressed in the Strategic Direction.

Are there changes in how we are proposing to allocate resources that could better address the program intent statements outlined in the Strategic Direction? Please explain why you believe your suggestion for allocation is better than what is proposed.

In 2001 FLT acknowledged that the existing workload in the NER and SCR required 2 FTE regional urban forestry coordinators in each region and authorized a budget request for those 2 additional positions. Ten years later, that service demand has only increased and the new Strategic Direction requires even more collaboration to accomplish mission. The Operations plan does partially acknowledge this long overdue need to address the service deficit by dedicating a "permanent" LTE to each region, but this is an inefficient and ineffective way to address highly specialized core work needed to accomplish the new Strategic Direction in urban forestry.

Preferred Recommendation #1:
FLT should finally recognize this long-demonstrated need and reallocate an additional permanent FTE urban forestry coordinator to the Green Bay and Fitchburg offices, bringing Urban Forestry's FTE allocation to 11.

Alternate Recommendation #2:
FLT should allocate a second "permanent" LTE position to each of the Green Bay and Fitchburg offices, bringing Urban Forestry's LTE allocation to 6.

Alternate Recommendation #3:
FLT should allow the Urban Forestry Team Leader to allocate a second federally-funded LTE position to each of the Green Bay and Fitchburg offices to achieve a similar service delivery capacity as long as federal funds are available. FLT should also allow the Urban Forestry Team Leader to request additional justified, federally-funded LTE positions as the need arises in other service areas, dependent on availability of federal funds.

Are there opportunities for increased efficiency and effectiveness in program implementation that we have overlooked?
Despite what Paul said at the second Town Hall meeting, the centralization of supervision of the Urban Forestry Program <u>will</u> isolate it not only from the other field programs, but most importantly from the understanding and influence of FLT. In the current regional model, our Regional UF Coordinators have the ear of their Regional Supervisor and their Regional Forestry Leader. In the new structure, not only is that connection lost, but there are now two remote levels of supervision imposed between our field staff and their now single FLT advocate. Unlike Paul's example of Forest Health, Urban Forestry does not work with the Integrated Programs so there is no natural connection.

As I see it, the District Forestry Leaders will be concentrating their attention on the Integrated Programs that they supervise, the other Bureau Chiefs will be concentrating on their programs and the only FLT member with any direct connection to UF will be overloaded with other issues. This does not bode well for UF or other specialty program when the reality of FLT's decision-making process in considered.

Recommendation: FLT must create a conscious and deliberate mechanism to maintain a connection to statewide outcomes among all programs not just the ones that they supervise or that have the most complaints, and each FLT member must commit themselves to advocating for all program outcomes in their geographic or programmatic sphere of influence. To complement FLT's commitment, the specialty programs must commit to communicating their outcomes, their issues and needs, and their impacts on the forests of the state to FLT.

Without a deliberate and conscious effort by FLT members and staff to advocate for all program needs and outcomes, the specialty programs will lose all practical representation and become the Districts of Columbia of the Forestry Division.

#83_____

The Draft Strategic Direction Ops Plan indicated an additional position will be allocated the monitoring and administration of conservation easements. This position is appreciated and will help with the continuously increasing workload associated with conservation easements. Current staffing for conservation easements is 1 FTE and 2 LTE. The proposed org chart shows 1 LTE associated with the conservation easement position. With the additional FTE positions for conservation easement being split between easements and private forestry work, there is a concern that more than 1 LTE will be necessary to meet the current workload associated with the conservation easement FTE and the 2 current LTE positions. The omission of the 2 LTEs associated with conservation easements may be due to the confusion with federal vs. state LTE positions being recognized on the org chart. The 2 current LTE positions are funded through a federal grant.

There are still widespread concerns over what 'missing positions' and what that means for that individual currently working in that position. Guidance provided is general and doesn't address individual concerns. Town hall, FAQ's suggest affected LTEs engage supervisors for specific questions and impacts; however they don't seem to know any more about the subject and unable to advise staff on those intentions.

There has been a lot of information focused on how FTEs that will be displaced through this realignment process and how the Division will work with the individual to find other options. There has not been that same emphasis on LTEs that are affected through this process. While I understand details are still being sorted out with the new Compensation Plan and how this will affect the hiring process I hope these changes will provide new opportunities for LTEs to apply for FTE positions, especially when it is a FTE position that was previously an LTE position.

#84_____

While it is a given that taking on fire response duties to staff the Tomahawk heavy unit will impact the production work of the Forestry Equipment Section, especially during a high activity fire season, I have no major concerns with this plan. As the implementation draws closer I am sure we will work out any and all details that revolve around the increased duties to this section. So far we have not identified anything that we see as a major hurdle. We currently have a good relationship with the Woodruff area in assisting and getting assistance to support each others needs during normal and abnormal workload periods.

We cannot speak to any other work load issues concerning the Tomahawk technician.

#85_____

As I said previously, I do not support the current Ops Plan "as is" but support changes to the status quo to further the mission of the Division of Forestry with the limited resources and positions available. The loss of the additional Technician position will create a greater pressure on remaining staff and outside-of-Area resources to meet the large 2,800 hour commitment to one County. We will have to do better at moving personnel resources to meet current county time standard goals.

The current Ops Plan also calls for the reduction of a Forestry Technician position with the supposition that the program needs of that position can be fulfilled through reallocation of an FTE or portions of an FTE from another program. I do not support this proposal for reasons identified in a previous email on November 18th. The best solution would be when the position becomes vacant to refill the position with a Technician capable of meeting the full spectrum of Forestry program needs in conjunction with the Forester-Ranger position. This would allow for increased productivity without potential losses due to "off loading" workload.

If this is not a possibility due to limited position resources then I would offer another option. I would suggest that the proposed additional Forester position be put on hold until the current Forestry Technician position becomes vacant due to attrition or an established timeframe. At the point in time when the position is vacant, I propose that it be filled as a Forester with an assigned heavy unit and associated duties similar to another proposal. The position would be assigned additional private forestry duties in portions of the FRU along with the Forester-Ranger to meet the private forestry workload. This would be similar to the current plan in place to have the Forester-Ranger and other members of the Team assisting with trying to meet that private forestry workload. This proposal would suffice the long term goal of meeting private forestry workload while not detracting from other program productivity or that of the Forester-Ranger. It would reduce potential supervisory conflicts by maintaining a clear chain of command between District and Bureau personnel resources at all times of the year.

I hope you will consider these options during your discussion of the Operations Plan. I would appreciate your feedback on these options and would gladly be willing to discuss my ideas. I propose them in hope of the best alternatives for meeting the long term goals of the Division along with the best options for our most valuable resources, our staff. Thanks for your consideration and continued support.

#86_____
State Lands Forestry Workload Inaccuracies

1. What work that is important to our ability to implement our Strategic Direction have we overlooked? Please explain why the work is important in your opinion.

Introduction: I am concerned about the time standards tool that the State Lands SD team used as the sole measure of forest management workload for the following reasons:

Time standards accuracy is highly questionable. They underestimate for some factors and overestimate for others. Time standards rely on past data for much of their assessment and therefore they do not reflect the workload going forward. The staffing levels proposed due to time standards result in a staffing distribution that is highly inequitable compared to future workloads. These staffing levels would severely handicap two state forests ability to meet annual establishment goals while oversubscribing others.

Background:
Determining annual workload for state lands forest management is difficult. The state forest assessment team (not to be confused with state lands SD team) realized this and the issues resulting in relying on any one tool to measure annual workload. As a result the state forest assessment team relied on multiple tools to measure and compare workload amongst properties.

The state lands SD team did not have the luxury of time to study multiple indices of workload and instead relied on time standards from the state forest assessment as their sole tool. This ignored the findings of the assessment team that time standards are not accurate and the fact this included data collected from FYs 2007-2009 which does not reflect future workload needs.

To verify the accuracy/inaccuracy of time standards I conducted a three year analysis (FY 09-11) of actual acreage production related to time code hours for the Black River State Forest. I then normalized those production levels to an annual recon goal of 5% and an annual timber sale goal reflective of the long term annual goal from WisFIRS. For administration it is not possible to determine the number of acres administered on an annual basis so a three year average was used. Cultural work, contracting, and miscellaneous are covered under the column of other.

Table 1.0 Comparison of workload on the Black River State Forest using time standard data from 2007-2009 and using actual time code and production values from 2009-2011

Data Source	FRAA	FRAB	FRAC	FRAD	Other	Total	FTE Equivalent
BRSF Data	484	1622	1341	486	272	4205	2.47
SD Time Standards	229	1971	655	245	272	3372	1.98
Difference	255	-349	686	241	0	833	0.49

Time standards appear to be most inaccurate when looking at the time required for sale administration. Time standards indicate 655 hours are needed annually yet the BRSF has averaged 1,341 hours for the past three years. Currently the Black has 35 open sales which suggest these hours are not going to be reduced any time soon.

Further questioning the accuracy of the time standard data is that while it suggests the BRSF needs 655 hours, the Brule River needs 467, and the Governor Knowles needs 427 hours (numbers not in table). However, the annual timber sale goal for the Black is 6-7 times greater than the Governor Knowles and 2 ½ greater than the Brule's.

Further compromising the quality of the time standard data is that for state forests it was based on forest management activities from 2007-2009, which does not reflect the current state of property's workloads. The use of 2007-2009 greatly benefited the Governor Knowles which experienced a short term increase in timber sale activity during this time period.

A primary goal of the state forest assessment team (again not to be confused with SD lands team) was to eliminate the staffing inequity that existed in the system. Unfortunately the proposed reallocations would not improve this condition but instead would simply reshuffle that inequity.

Table 2.0 illustrates the annual timber sale acreage workload per FTE equivalent would be with the changes recommended under strategic direction. FTE were calculated using permanent and LTE staff allocated through the state lands forest management planning spreadsheet. The average long term harvest goal from WisFIRS was used as an index of workload.

Table 2.0 Average annual timber sale workload per FTE based on WisFIRS 15 year average timber sale goals

Property	FTE	15 year goal	FTE /Acre goal
Black River	1.94	1488	767
Brule River*	1.01	600	594
NHAL	8.48	4705	555
Flambeau	5.00	2740	548
Kettles North**	0.88	440	500
Peshtigo	0.55	211	384
Kettles South***	0.51	150	294

Gov. Knowles	1.03	219	213
Totals	19.4	10553	544

* = Capped at 600 acres by master plan wisfirs goal is 1056
** = Capped at 440 Acres by master plan wisfirs goal is 553
*** = Capped at 150 acres by master plan wisfirs goal is 434

As clearly indicated there is a wide variation in timber sale workload per FTE. The Black's workload per FTE is considerably higher than all other properties including 3 ½ times the workload per FTE than the Governor Knowles. When one considers the artificial timber sale annual allowable cut established by the Brule's master plan its workload appears somewhat higher than other properties.

Not identifiable in the table is the efficiency of how each property's workload is distributed amongst staff. The Governor Knowles 1.03 FTE is entirely from permanent staff while the Brule River's allocation is .51 FTE permanent and .50 LTE. With one third the annual workload of the Brule, the Governor Knowles has twice as many senior forester hours as the Brule. In fact only the Southern Kettle Moraine receives less FTE senior forester hours than the Brule River State Forest.

Past experience clearly indicates that senior foresters assigned primarily to a property are the most productive, efficient use of staff. While Technicians and LTE play a role it is primarily in support of senior foresters. Productivity amongst technicians is highly variable. LTE positions typically have a high rate of turnover and require a fair amount of oversight from the senior forester positions. With only 1040 LTE hours available on most properties it will be difficult to attract and retain employees. These positions would be a revolving door.

It could be argued that in the case of the Flambeau and NHAL a five year average timber sale goal should be used instead of WisFIRS. This would be due to the five year objective to eliminate backlog which will result in a higher annual goal than depicted in the table. However, this would ignore the fact that priority implementation funding (PIF) is available to both properties to deal with this short term increase in their workload. Theoretically both properties should score high in the PIF process and be able to increase their LTE complement. In five years when both properties timber sale backlogs should be eliminated the annual acreage goal per FTE for the Flambeau and NHAL will drop to 453 and 441 respectively.

2. Are there changes in how we are proposing to allocate resources that could better address the program intent statements outlined in the Strategic Direction? Please explain why you believe your suggestion for allocation is better than what is proposed.

My Proposal:
The workload analysis, using time codes and annual accomplishments for the past three fiscal years indicates that the Black River State Forest needs additional FTE to reach its projected long term annual goal for timber sale establishment and recon. I suggest that an additional .66 FTE comes from the time allotted to the Governor Knowles (60%) and Peshtigo (.6%) and that it comes from primarily the professional forestry classification.

I also suggest that the Brule be allocated additional help including at least 9% of an FTE from the Peshtigo River State Forest. In addition their staffing complement should come entirely from FTE with a suggested ratio of ~ 85% senior forester and 15% Technician. The table below shows the proposed allocation of FTE and its relationship to annual timber sale goals:

Table 3.0 Proposed long term average workload per FTE

Property	FTE	15 year goal	FTE /Acre goal
Black River	2.60	1488	572
NHAL	8.48	4705	555

Flambeau	5.00	2740	548
Brule River*	1.10	600	545
Peshtigo	0.40	211	528
Gov. Knowles	0.43	219	509
Kettles North**	0.88	440	500
Kettles South***	0.51	150	294
Totals	19.4	10553.0	544

* = Capped at 600 acres by master plan wisfirs goal is 1056
** = Capped at 440 Acres by master plan wisfirs goal is 553
*** = Capped at 150 acres by master plan wisfirs goal is 434

These suggestions provide parity in the state forest system, with most properties annual workload ranging from 500-572 acres per FTE. The Kettle Moraine South unit may appear to be an outlier under this scenario but when one considers they are capped at their annual timber sale output compared to their WisFIRS goal I would argue their workload is closer to the other properties.

3. Are there opportunities for increased efficiency and effectiveness in program implementation that we have overlooked? Please explain how your suggestion would increase efficiency and effectiveness.

One of the seven forester positions on the NHAL should be reclassified as a visitor service associate. This position would then be assigned all responsibilities for timber sale bookkeeping. This would generate additional savings through a reduced salary rate. These dollars can then be reallocated to assist with some of the recommendations suggested in this document.

Additionally the 1040 hours allocated to the Flambeau for an LTE forester should be changed to a visitor service associate, which also generates additional savings.

Feedback from External Partners

A
Department of Agriculture, Trade and Consumer Protection

I would like to voice my support and appreciation for the proposed changes in the Supervisory Structure of the Forest Health and Urban Forestry Programs. As a partner who works with these programs on a regular basis, I believe this change in Supervisory Structure will create efficiencies in coordination, improvement in communication and overall better team cohesion in addition to the improvements addressed in the plan. It is very challenging to work with numerous staff in one program that all have different supervisors.

I am excited about your plan and I look forward to working with the newly configured Supervisory Structure. Please let me know if I can be of assistance with the coming changes.

B
American Forest Foundation

Thank you for this opportunity to comment on the Division of Forestry's Draft Operations Plan. The American Forest Foundation (AFF) works with family forest owners in Wisconsin and across the country to help them meet their personal woodland goals while protecting the clean water, wildlife, and jobs – among other values – private forests provide. Our comments therefore will focus on the sections that are relevant to private forests.

It has been said over and over again, but bears repeating. With over 350,000 landowners owning 65% of Wisconsin's forests, inspiring and helping landowners become strong stewards of their land is a difficult yet essential task. The number of landowners, the myriad issues they face, and shrinking budgets necessitate new strategic approaches and partnerships along with an alignment of resources to those approaches and partnerships. Simply put, working the same way we have always been working is not an option if we are to safeguard the state's private forests and all that they provide to the people of Wisconsin.

The proposed changes in the Operations Plan for private forests reflect the need to adjust strategic focus and investment of resources to meet the challenge of reaching more landowners. For example, shifting forest technician positions to foresters to have more capacity for landowner outreach is the right kind of strategic adjustment, and one that AFF supports. The biggest proposed change is to the Managed Forest Law (MFL) program. While MFL is a success in large part due to its rigorous monitoring system, a balance must be struck between maintaining that system and the urgent need to free up resources to reach more landowners. We believe the proposed changes could help do that exactly that. Of course, accomplishing this balance will not occur overnight. Therefore, given the urgent need to reach more landowners, we strongly urge the Division to begin implementing the proposed changes as soon as possible. .

To that end, please consider how the Division might take advantage of the new collaborative effort in Wisconsin's Driftless Area. As you know, AFF has teamed up with many partners to test new approaches to reach and support private forest owners in this ecologically and economically critical landscape. The Division of Forestry is one of our most important partners there. Through this coalition, we hope to achieve greater impact by eliminating redundancy, gaining efficiencies through collaboration, and creating new tools that meet strategic needs. These are the same kinds of strategic drivers the Division has identified in its own strategic planning. As the Division takes the next step by developing its business plan, we suggest considering whether the Driftless pilot could offer a strategic opportunity to help implement one or more of the proposed MLF changes sooner than later.

In summary, AFF commends the Division of Forestry and its leadership for the thinking and approach framed by the Strategic Directions and the Operations Plan. When it comes to private forests, the Division has established the right strategic approach to meet changing landowner needs and demographics through investment in more direct landowner contact. By working in close partnership with private organizations also in direct contact with landowners, we can collectively identify and test new ideas to see what is both practical and helpful to landowners while achieving important gains in protecting Wisconsin forests. It is a challenging future, to be sure, but one we believe together we can embrace.

C_____
State of Michigan

I have reviewed the information sent out by Paul in regards to you proposed Division Operations Plan. As Michigan's State Wildfire Supervisor I focused on the fire portion of the plan. Recognizing that the Division must live within current constraints, it appears that the proposals in this area are well designed and should provide the best possible service following your states Assessment. This includes the cost saving proposals made. I would add the comment that I believe it is critical to provide strong support for the Division's Incident Management Teams, the Division's wildfire training program and the need to have staff meet all needed qualification levels, the Division's wildfire prevention efforts, the Division's wildfire equipment compliment, and the staff needed to manage the program and provide support and guidance to local fire departments.

I also oversee the Michigan Department of Natural Resources Private Lands Forestry program. I believe the shift in you Urban Forestry Program to a canopy based system is the right approach. It should give a broader perspective of those areas allowing for better integration with other program elements.

D_____
Wisconsin Center for Environmental Education, College of Natural Resources, UW-Stevens Point

I've reviewed the op plan. Overall, I think it makes sense and looks good.

The move to the urban forest community canopy model is good. The scaling and shifting of nursery efforts seems appropriate. The new approach to working with county forests via a "menu" seems like a good approach to decrease investment, but target support for what's needed most. And, the desire to increase effort on reaching additional private landowners is great (aside from education, I think this is the area of greatest need).

I understand the need for the industry specialist positions. I hope these positions can be focused on emerging and non-traditional markets to help diversify the options available. If they are going to primarily support traditional markets and the large companies, then I think there should be some private funds invested so that the positions are public-private partnership.

And, of course, I look forward to (and being involved with) the Division's effort to develop an outreach & education plan.

E_____
WWOA Gov Affairs Committee

The Wisconsin Woodland Owners appreciates the work put into developing the forestry operations plan. To avoid diluting our primary message, I'll only pass on a single concern WWOA has expressed many times over the years. Quite simply, we believe it is important that the DNR emphasize efforts to work with "uncommitted" woodland owners.

We recommend the department provide more detail on a plan/program that will lead to increased contacts with woodland owners. The current language (emphasis added below), sends a message that this is a low priority for the department. We trust that is not the case.

> "*Over time, as these time savings are realized, we will shift resources and staff time* to increase efforts to reach the large percentage of private forest landowners who receive no professional assistance in caring for their forest land. We will work with partners to pilot different techniques for reaching private landowners and then evaluate the level of success achieved with each investment." Division Operations Plan, PRIVATELY OWNED FOREST LANDS, page 7

F_____
UW Madison

I have read (twice!) the proposed Operations Plan and offer some comments below. I was not party to the discussions regarding the crafting of this plan, so I do not know what other elements were considered but not included, or which items generated substantial discussion. Thus, it would be presumptuous of me (or arrogant) to now suggest that you have any serious omissions or failures here. I could not re-write this plan and improve on it – the WDNR staffers are the only ones in a position to know what precise actions need to be taken. And it will be up to Paul D. and the leadership team to convince rank and file staff (and politicians) to accept and implement them.

On reading the plan I can see several actions that I think are long overdue -- had some of these policies been in place earlier, some 'specialized' programs such as the state nursery program and the tree improvement program would have functioned better. Too bad - but it is better to correct some things late than not at all. Other actions are timely but I wonder whether there is adequate flexibility to accommodate unforeseen changes, e.g.

the industry development program proposal to add 3 new positions; how can you be sure that a hire you make today in, for example, bio-energy, will remain relevant if federal policies move elsewhere? And how can you be sure that the next corporation into the state will accept the new policy or structure?

Overall, I like what I see. In many respects, this will be an improvement over the status quo.

Specific Comments:

1. Page 2 re. Industry Development: "...to provide industry analysis, information and guidance regarding forest resource availability and demand, market trends and opportunities (both local and international), harvesting and transportation efficiencies, and manufacturing process improvements." If I am reading this correctly, forest resource availability (i.e., inventory) will become a part of industry development - is that true? Will one of these new positions be inventory? Or will that function be tied to science services including remote sensing? I only wonder because resource availability is more than fiber - will there be a separate arm for other resources besides timber? I applaud the decision to put more resources here but 'industry development' can be very dynamic depending upon markets, the economy, federal policies, etc. How will you be able to reorient activities to the current demands?

2. Page 2 re. Forest Health: I agree that invasive species pose a continuing threat to forests but I am assuming that more traditional 'forest health' concerns such as indigenous pests, and/or non-biological problems that relate to health will not be neglected. I do not know how the proposed focus for forest health will actually work but my own experience suggests that it must be tied closely to management and (especially) silviculture if it is not to become merely a litany of descriptive analyses for which no strategies or solutions exist. Knowing a problem 'exists' does not necessarily suggest solutions to correct it - forest health must be more than surveys.

3. Page 2 re. Urban Forests: "In addition resources will be allotted to fund an Urban Inventory and Assessment System." Good idea - I presume that some communities have benefited from the current urban forestry program, but I believe it focused too much on 'street trees' perhaps because that was what Bob Skiera and Bob Miller thought was important (and promoted in school). Too much energy was focused on too few communities that wanted to plant trees - a community canopy model program will begin to create a more holistic accounting of the value, problems and opportunities presented by urban forests, especially off the boulevards.

4. Page 2 re. Nurseries: The shift away from growing and selling seedlings to a more comprehensive regeneration program has been developing for years. Everyone not wedded to one or another of the state nurseries has seen this coming ever since forest industry began selling their timberlands. Yes, individual landowners still buy seedlings but without a major (industry) program of planting, declines in nursery production were inevitable. Other factors also contribute (e.g. forest fragmentation, small ownerships, second home sites, etc.), but it is time to close another nursery and re-orient the remaining ones to more than just planting and lifting seedlings. The key to accomplishing this is contained on page 7, "Staff in the Specialized Programs (Industry Development, Forest Health, Urban Forests and Nurseries), will now report to a program supervisor within our Bureau structure, similar to how the aeronautics program has functioned since coming to the Division." Without this important policy change in bureau structure, local and regional politics would continue to capture specialized services to the detriment of larger state goals. I witnessed this problem firsthand for decades -- it was difficult and at times impossible to gain the support of nursery staff for assistance with tree improvement work when their reporting authority and allegiance was to a regional office and not bureau staff in Madison. This change is long overdue.

5. Page 3 re. Cross Program Activities: I welcome almost all of the actions noted under this section, especially the forest economics and forest genetics (not just tree improvement) positions but also the IT/GIS positions. Regarding the latter, how will these be linked to, e.g., the 'resource availability' position considered under Industry Development? I see a need for coordination amongst some of these new 'specialization' positions but

it is not obvious how they will be organized. I can see important linkages among several of these but can see no mechanism or structure for integrating them. It would be unfortunate if one or more such positions were isolated and without access or connection to others.

6. Pages 3-6. I have little to say about the Integrated Program or its subsets, e.g., fire protection, because I am less familiar with these programs. I assume that others more knowledgeable will comment on them. Likewise, looked at the maps but without benefit of the discussion that paralleled their construction, I have no basis for suggesting changes. The maps, at last, are not as gerrymandered as the state's legislative districts.

7. Pages 7and 8 re. Supervisory Structure and Organization. I have already commented favorably on the long-overdue change that brings many 'specialized services' such as nurseries under a central supervisor rather than a district office. This change is long overdue and should now allow for a more coherent allocation of resources and reporting than exited previously.

8. Page 9 re. Facilities Consolidation. I hope that the proposed consolidation can actually occur – and smoothly. In my experience, this can be a major hurdle – there are many entrenched interests. The process is not unlike military base closure. Recall how difficult it was for Congress to move anywhere with this issue. You should probably be prepared for pushback here and it would be wise to align support with legislators and others re. the fiscal benefits of some consolidation.

G_____
Natural Resource Board member

Thank you for the opportunity to review the Division of Forestry Operations Plan. I find it to be very interesting. My overriding question is if the plan is a good plan, why would it take us 3-5 years to incorporate it? I realize I come from the private sector and the smaller the company, the quicker we can respond to changes in the environment (business, public and nature). I understand that the DNR is a very large organization with some obstacles that require a certain amount of time to address, but I do believe that we need to take whatever actions are necessary when we feel we have the right, appropriate and proper vision. We should be embracing a much faster implementation strategy. I look forward to your comments. Thank you.

H_____
Poy Sippi Fire Department

I have some concerns with the proposed Coop positions. I think the 50/50 work load with Fire and LE will decrease the training to coop FIRE Departments. The two jobs may fit from a forestry stand point. I'm not sure about Fire-LE needs in the coop at this time. Maybe in the future if burn rules change.

When someone has a job description of 50/50 , they always seem to do much more work on one over the other. This could come from a need or work load. Most likely I think it would come from the priorities and history of the employee.

I relate my thoughts to the history of Wis. DNR Forestry. When I started there were Rangers and Foresters. In the eighties the change was made to Forester/Rangers and Ranger/ Foresters.

I and others have watched some Areas or FRUs work toward their priorities. Many Foresters just do fire work to get by. Some Rangers just do enough forestry work to get them to the next fire season. I feel this would be the same in the coop area. The Fire department training would fall to a fill in duty.

I would suggest the four Coop positions be 2 Coop LE Rangers and 2 Coop Instructor Rangers.

The workload would be the same as the proposed plan. The difference would be 4 people focused on their duties in the Coop. The main difference would be some extra travel time. I think a quality program would offset this expense.

The training and partnership in protection areas has paid off over the last 20 years. This is our opportunity to promote safety and teach the majority of Fire Departments in Wisconsin.

I_____
Florence County Forestry & Parks

I have some comments from Florence County regarding the proposed Strategic Direction and how it is going to affect Florence County. First off Florence County has been an advocate for the DNR forestry staff and has been looking for DNR to add a public lands forester to the staff in Florence. We have heard that as part of the reorganization that this will be happening now. That is great news however it comes at a cost. We have been told that we will lose a technician, and the team leader position will now be considered an office position. So we are losing two field forestry staff and gaining one. This goes against what the DNR has been doing in this county for the past several years. The DNR has been acquiring lands in Florence county and has not looked very closely at the time commitment those lands will be needing in the future. According to the workload allocation only 1269 hours of tech/forester time is allocated to state lands work. This is very low! I would expect that to be closer to 1600-2000 hours per year.

Another factor that has not been taken into account is the number of staff hours that it takes for the increase workload due to certification. We have noticed on the County lands that the number of hours dedicated to certification in the time standard formula are not adequate. If it is not correct on county lands then the hours required for state lands will not be correct either.

I feel that the DNR has not fully looked into the number of hours it takes to run the forestry programs in Florence County (County or State lands). I hope that these comments will be taken into account. Florence County relies heavily on forests for employment of its residents.

J_____
Price County Forestry

I have a couple of comments regarding the plan as it related to Price County. I noted the 3 facilities listed, the station in Prentice should be closed. Our fire issue here is minimal. The Phillips facility costs the state $326.50 per month in rent. It houses the liaison, a private forester, the warden and the federal trapper. If this facility has to go by the wayside I would offer office space to the liaison forester. The close proximity makes our operation efficient and saves the state many miles. He rides with us on most of his field time on the Price County Forest. Thanks for the opportunity to comment.

K_____
These comments are more from my personal perspective than my role on the Urban Forestry Council, as obviously there is a huge variety of backgrounds and viewpoints there.

I appreciate the overarching view of the document, and think that it is a great direction to take. I just had one concern to pass along. . .

Although not expressly stated in the document, some of Friday's discussion indicated that grants would focus more on a few larger grants (assuming Urban Forestry Grants?) that involved "multi-community partnerships," rather than the smaller stand-alone projects that are funded now. Seeing first-hand the boost that these grants

gave to Sparta--and knowing that the program in Sparta literally would not have happened without them--makes me worry about this approach.

For small towns without a professional forester on staff, the best way to take baby steps in our urban forestry program was to be able to tell the City Council that the effort was being funded by this grant. While I applaud promoting partnerships in the grant process (i.e. rewarding grant applications that have partnerships set up), I hope that this won't exclude the types of projects that were so valuable to Sparta. After all, most small towns aren't close enough to other municipalities to do a "multi-community partnership" efficiently. I fear that many wouldn't even try.

Even though stand-alone projects may not have some of the impact of larger ones, they may allow a community to develop a champion for trees where one didn't exist before. That's what happened in my time in Sparta.

L_____
Packaging Corporation of America's (PCA)

First of all, thank you for requesting our input on the Division's Operations Plan. We value the opportunity to partner with you on the management of Wisconsin's forests. We are hopeful this dialogue can produce a "win-win" for stakeholders, both short and long term.

As previously communicated in the earlier stages of your strategic direction development, forest industry evaluates the Division of Forestry's actions with two key criteria. Does the action or in this case plan support the health/sustainability of WI forests and does the action provide support to maintain and increase wood availability. Overall, the material provided in the Ops Plan is aligned with both of these criteria and should yield favorable results - both economic and ecological.

Below are some brief, specific comments regarding a couple of areas within your Ops Plan.

- State Lands - we appreciate the effort to manage "all" State Lands, not just the State Forests. If there is one silver bullet for the forest products industry in WI right now it would be access to wood fiber. Managing the sustainable harvest from State Lands is part of that solution.
- Privately Owned Forest Lands - as you allocate resources to implement the MFL program we are concerned about the passive management by large block landowners (former Plum Creek/Potlatch lands). Small private landowners are required to implement their management plan, as should the larger block owners.
- Supervisory Structure - we support the direct line authority you are implementing. This should develop efficiency and accountability.
- Workforce Alignment - this is a difficult area for outside partners to provide objective input, but nonetheless, our impression is you have a good strategy here. Timing will be important. If mid-level managers and field personnel have a long wait for direction, there is more potential for them to speculate nothing is going to change and they are the action role in implementing the new plan.

Thank you again and we look forward to the implementation stages of the Division of Forestry's Operations Plan.

M_____
A wonderful plan. I cannot think in that verbiage. But I wonder what 5 years of "not looking" will do for the MFL.

Two suggestions:
1. Hire your "research". I always looked at Forestry as applying the best science available - available from research institutions.

2. Hire your "law enforcement". The Warden force is fully staffed w/ personnel alluded to in the LE paragraphs. (I bet that it wouldn't take a Warden all but a full month to get posting signs down from a piece of MFL Open.)

AND, WHATEVER YOU DO, GET RID OF THE FOLLOWING SENTENCE FROM THE LE PORTION: "Effective law enforcement necessitates officers to spend a significant amount of time conducting law enforcement."

N_____
We-Energies

I read over your information last night. And I like the direction that you are heading. I also look forward to discussing additional ideas at our Urban Forestry Council meeting on Friday.

O_____
How much does it cost to become a "Forestry Partner/Customer"? Let alone a "Dear ....." one.

Take that entire soliloquy on Law Enforcement out of 'Thee Plan' and replace it w/ a picture of posted MFL Open lands. (Evidently that picture isn't hard to get.)

Seriously, did you read this sentence in that LE paragraph: "Effective law enforcement necessitates officers to spend a significant amount of time conducting law enforcement."

P_____

Thanks for the chance to see where the Wisconsin Forestry Program is headed.

It is refreshing to finally see an organizational plan designed to meet the needs of Wisconsin's FORESTRY resource - as opposed to yet another attempt to make the best of a "one size fits all" organization that had to apply to the management all natural resources and worked best for none.

This plan looks like a major step toward equity in the allocation of staff to resource needs, supervisory span of control, and the flexibility needed to meet specific local situations. Accountability and efficiency will be increased - the bedrock of any effective organization.

Hopefully it will result in less time spent game-playing and more time doing actual resource management and protection.

My view is too ancient and foggy to make any judgment as to the merits of individual tradeoffs that must have been considered, but I feel VERY confident that this new organizational structure will have a very positive impact on the forestry resource in the state of Wisconsin.

Q_____
Thank you for the opportunity for NRCS to comment on the Operations Plan.

After reviewing the Operations Plan, I have a few comments; maybe they qualify more as observations.

When I first read through the Operations Plan, I got the feeling that field forester staffing levels were going to be reduced, but as I dug into it a little further – just the opposite. My fear was that a reduction in field foresters would have a negative impact on the delivery of NRCS Forestry programs because the DNR Foresters provide vital assistance to us in many, if not all counties. While there will be less Forest Technician positions, the numbers of Professional Foresters looks like it will increase.

The continued shift of MFL planning and practice implementation assistance to the private sector and the addition of Field Foresters means there will be more assistance available to previously un-engaged forest land owners. As the private consultants get more involved in the implementation of practices, I see a need for NRCS to provide more education and training to these consultants regarding available financial assistance programs.

The proposed shift and re-alignment of resources (mainly personnel) may have an impact on our partnership. I shared program information with Carol Nielsen a month or so ago to use in analyzing where program activity was heavier and take that into account when looking at the placement of personnel. I visited with her last week and she assured me that the information I provided was considered in the equation.

The proposed facility consolidations in most of the locations will be gaining in total personnel, so although the forester may not be as strategically located to NRCS Field Offices, in this age of telecommunication and computers – I don't see a big issue there. There will be more foresters to provide assistance.

Besides the training issue I mentioned above for the private sector, the other opportunity I see here for NRCS is take a closer look at the 5 major issues that have been identified through the Statewide Forest Assessment, the Statewide Forest Strategy and the Plan of Operations and see where/how we can support them. We will need to keep communicating to maintain our working relationship through this process.

R_____

I have given this plan a good deal of thought, and apologize for waiting until the last possible moments to provide my feedback. First I want to commend you on your methodology, thoroughness, and inclusive nature when approaching change. Although it is difficult for many, you provide ample opportunities for involvement, which lessens anxiety for many.

Second, your science is solid and nothing for me to question. You're the best people to figure out the trends, future, and critical needs for forestry. To doubt your work would be pompous on my part, and that's not my way.

So, what do I have to comment on? Marinette County. I am concerned over having Marinette County cut in half with the north and south halves on different teams. I am confident that DNR could work through it with little difficulty, as well as the public… our County partner, dispatch, and others however may struggle with no real need to. I propose a different alignment of counties and teams as follows.

- Have Marinette County be its own team.
- Oconto can stay with the Shawano, Menominee, and Waupaca.
- Florence and Forest and the rest of the 'old' NOR teams stay as recommended.
- Door, Kewaunee, Manitowoc, Brown, Outagamie, Winnebago, FDL, and Sheboygan become one Team… could be the North Lakeshore.

IF that north Lakeshore team reports north to Green Bay… it mirrors what we did in Wildlife, which make some amount of sense, considering state lands management. If the north Lakeshore team stays reporting south, it adds to the Southern Districts compliment of reports, etc. I have no strong opinion as to which direction it should go. Again, my concern is splitting Marinette County in two.

This idea does create the need for one additional team (?) supervisor to supervise the north Lakeshore team. That could be the sticking point.

Again, thanks for the opportunity you gave me and the other forestry-related, interested individuals. It is greatly appreciated.

S_____
USDA, FS, Chequamegon-Nicolet National Forest

The Forest acknowledges this document and its contents as a culminating product based on extensive data gathering, partnership engagement, insightful analysis, and recognition of diminishing capabilities resultant of government austerity direction.

The specifics addressed in the Proposed Operations Plan represent a practical approach to accomplishing the Division's mandated responsibilities. No obvious areas of concern were overlooked in the document. The CNNF does not have any changes to suggest. It is apparent the Division has identified and intends to implement the most efficient and effective strategies maximizing limited resources to meet the intent of the Strategic Direction.

As partners in managing large public forests in the State of Wisconsin, we share several common concerns identified in the Operations Plan: Reduced funding levels; improving forest sustainability; maintaining and recruiting competent staff; appropriate facility management; and, offering the highest level of public service. Collectively we should be able to share ideas and maximize our use of resources that will result in successful attainment of common goals.

Thank you for this opportunity to continue our relationship with the State of Wisconsin, Department of Natural Resources, Division of Forestry. The CNNF remains committed to furthering our role as an active partner in sustainable management of Wisconsin's Forests.

T_____
Great Lakes Timber Professionals Association

Industry Development
The Division is allocating resources for three additional Industry Specialists. It then goes on to say the Division will be working with industry to determine what type of assistance and expertise is needed. This plan seems to be contrary to normal business operations. It would seem logical we would do an analysis with industry to see what is needed before hiring any additional positions. Industry for the most part seems to find its own markets based on product need and profitability.

The bigger issue is keeping current wood using facilities updated so they remain competitive to stay running in global competition. The second issue is reliable data as to how much raw material is available. There have been many discussions over the past several as to what information is accurate enough to give incentive for the building of additional wood consuming facilities. It may be the department's role to facilitate efforts between private and public inventory managers to provide accurate information that can be trusted and utilized to promote investment into current industry or new.

We also don't think it would be beneficial for the department to get involved in transportation when there are currently many studies being conducted on transportation within DOT and UW.

Integrated Programs
Shifting workload seems to indicate there will be more forester positions shifting toward oversight of MFL programs. The Division may have a role in being a "neutral" party to enroll landowners in forest management programs however the consulting forester groups are well equipped to write and implement plans according to science based silvicultural practices. There are more professional foresters in private business than ever and they should be utilized to the fullest. We might also add that trust between the Division and private sector foresters is almost non-existent which is being reaffirmed by the addition of more oversight which is something we will not support.

County Forests
Statements within the OPS document would lead one to assume that counties were in favor of reduced funding for forestry activities. It would also appear as time goes on counties will be lead to hire their own experts with some fiscal support from the Division. Rather than fiscal support to hire more "experts" the plan should dedicate a percentage of its "expert" time to counties as needed. Are more experts needed or it a matter convenience?

State Lands
As more state lands are acquired the allowable harvest should increase as well. Division forester time would be well spent managing state lands to capacity harvest levels to achieve allowable harvest. The implementation of lump sales should help in reducing the number of hours to manage a timber sale.

Private Owned Forest Lands
This area needs clarification. Under integrated programs it seems there would be more interference from state foresters on private lands while this section indicates otherwise.

Overall the OPS plan doesn't seem to provide any cost savings for land ownership, but it does do a nice job of shifting work around evening out work load which will hopefully provide better owner services.

V_____
Bureau of Endangered Resources

Thanks for the opportunity to comment on the Proposed Operations Plan. The Division of Forestry has clearly put a great deal of effort into the entire process from the Statewide Forest Assessment to this most recent document.

As a general comment, the document provides a very broad overview and few descriptive details about many of the plans. This, no doubt, was by design, as this is meant to be a shorter, more high-level document. However, in some cases, it can be difficult to provide feedback without knowing, more specifically, how some of the proposed plan items will be implemented.

As the operations plan is very general, how will staff use the information from the Strategy and the Strategic Direction? Most of the substance developed during this multi-year process is contained in the Strategy. How will the Strategy and the Strategic Direction be used, and will staff be directed to make the strategies a priority beyond what is in this work plan?

BER provided detailed comments on the Strategic Direction (attached). Many, but not all, of these were addressed in the "Response to Comments" document. We will not repeat all of those comments here, but there are some that warrant repeating, so they have been included.

1. Forest Health (Specialized Programs) - we agree with the increased emphasis on invasive species, but are concerned the status quo of no significant changes dramatically underestimates the threat invasive species pose to our forests' health. We need much more than technical advice and more resource allocation for actual on the ground control of invasive species.
2. Forest Sciences (Cross-program activities) – it is great to see that the division will be maintaining expertise in these areas. These positions have collaborated with BER in the past on several topics.
3. Forest Certification (Cross-program activities) – the continuation of resource allocation for forest certification needs more clarification. Long-term monitoring, pesticide use / education, and continued degradation of our reference areas are chronic issues that the auditors ask questions about every year. We collectively respond to CARs and Observations and do what's necessary to alleviate the auditors'

concerns. However, with reference areas we have an additional obligation to manage them to Department standards. This consideration seems to be lacking anywhere in the operations plan.

4. (County Forests) - consider adding High Conservation Value Forest management practices, in addition to grants for forest and wildlife management practices.
5. Backlogged forest management practices (State Lands) – as we mentioned in the comments to the strategic direction, there are some major problems with how these "backlog" numbers are calculated. The recon needs to be corrected, and foresters need to be made aware of the problems.
6. Consulting Foresters (State Lands) – as already noted in the BER comments to the Strategic Direction, we have some concerns over the use of consulting foresters to establish timber sales on State Lands. In particular, we are concerned with using private foresters to conduct sales in Native Community Management Areas (NCMA). Again, we encourage some clarification regarding how the private foresters will be used.
7. (State Lands) - Managing forested ecological reference areas to Department standards is missing. We keep our products flowing, provide increased recreation opportunities, assure boundaries are legal and promote master planning, but we continue to let our best ecological reference area lands become degraded. A quality management cycle is not complete, if we continue to do so.
8. Reforestation (State Lands) - The operations plan states that the division increased funding for reforestation efforts on all state lands. This will be excellent in some cases (e.g, old fields in the Forest Transition Ecological Landscape where bigger forest blocks would be an improvement and wildlife openings in places with high deer numbers and otherwise intact forest). However, there are other places where this would be ecologically inappropriate. Property master plans will guide these efforts, but there should be a plan for dealing with the many properties that don't have master plans. Also, there is a general need to evaluate the best (and worst) places in the state to focus reforestation efforts.
9. Master Planning (State Lands) – Again, BER is highly supportive of the division's plans to assist other DNR programs with master planning efforts. It is unclear what form this support will take. Will it include biotic inventory work and/or direct master planning support?
10. Use of audits, instead of reviews for MFL (Privately…Lands) – if the division stops reviewing products developed by cooperators (especially timber sale cutting notices) there will need to be a discussion regarding use of NHI data. The reason our current system of getting NHI data to cooperators can work the way it does is because of the oversight and review provided by department staff. **This is an important issue**.
11. As a general statement, there is a need to add a monitoring component for many of our activities. This could be a greater focus beyond what can be done in WisFIRS.

W_____
Air and Waste Division

Thank you for the opportunity to review the draft Forestry Operations Plan - it is impressive, and supports your strategic direction well. The Air and Waste Division has no comments to offer that would affect the substance of your plan.

We look forward to working with you as you need us to in implementing your plan, or on any other cross-division issue that may arise in the future.

X_____
Wisconsin County Forests Association

Please accept the following comments from Wisconsin County Forests Association (WCFA) regarding the Proposed Operations Plan for the Strategic Direction of the WDNR Division of Forestry. WCFA has been involved throughout the development of the Strategic Direction and we value the opportunity to provide input. As public entities with significant investments in Wisconsin's forests we are growing increasingly cognizant of how forestry mill tax dollars are distributed in our state. These comments reflect opinions expressed by nine county forest administrators during a conference call held to discuss the plan and by additional forest administrators via e-mail correspondence. Jeff Barkley was present on the conference call.

Under the Specialized Programs portion of the plan we have some questions relative to the three additional Industry Specialists positions. We are under the impression that these positions will be regional in nature and will be under what has traditionally been labeled Utilization and Marketing (U&M). We understand the position descriptions (PDs) are yet to be developed but we question what the real workload will be for these individuals. We also question the ability of the WDNR Division of Forestry to accomplish economic analysis and attract business at a higher level than industry is able to. There is a concern that efforts put forth by DNR staff will duplicate efforts that already exist within county or community economic development agencies and UW Extension offices. That being said, some of our members with smaller forested areas and in closer proximity to urban or agricultural areas see the need for improved emphasis on forestry as an economic driver. We would offer that perhaps the division should take a more cautious approach to expending additional resources in this area. Is there a possibility that these positions could be temporary in nature, or perhaps a pilot program with a position in one region would help substantiate the need for the additional positions?

Several members of our association are concerned with increased resources being allocated to urban forestry while county forest programs in more heavily forested areas of the state are seeing decreased mill tax dollars. We understand the desire to better integrate the urban forestry program and have it more central based but again we question the need for additional resources going towards urban forestry. The point has been made that there is sufficient private infrastructure in existence, i.e. arborists, landscapers, and private urban forestry businesses to meet the need in our urban areas. We feel the current urban forestry staff is sufficient for providing necessary assistance to communities and awarding grants. We are unclear regarding the justification for this additional position. The question has also come up regarding UW Extension programs and Basin Educator positions being able to fill the needs in urban forestry; perhaps mill tax dollars going towards this additional position would be a duplicative effort? If indeed the Division does move forward with hiring an additional FTE in urban forestry perhaps that position could be utilized in part to address cross-program activities; i.e. that position could educate urban populations regarding the importance of practicing sustainable forestry in our northern forests, with emphasis on our county forest program.

Regarding the state nursery program, WCFA Board of Directors has gone on record in opposition to the discontinuation of seedling production at the Hayward Nursery. Many of our member counties have traditionally relied on seedling stock grown at the Hayward Nursery. However, there are member counties in our association that purchase and utilize trees from Griffith Nursery. We feel we have been vocal on state nursery operations and have nothing further to offer at this time.

We cautiously support the forest economics position described in the Operations Plan dependant on future directives. We have some question regarding the forest economics position versus the proposed positions in industrial development. Is it possible that the position descriptions for Industry Development personnel could be written to include the duties expected from a forest economist?

We have had some discussion regarding the necessity for the hiring of a full-time geneticist within WDNR Division of Forestry. It is unclear how the majority of this individual's time would be spent and what the priority issues would be. Will the position focus on state nurseries?

We support the two additional positions in IT for District ITGIS Professionals, particularly if the PDs will include duties serving to increase timely availability of information and upgrades to field foresters from regional IT personnel.

Information contained in the Operations Plan regarding outreach and education is insufficient to offer comment at this time. We realize the importance of educating urban populations regarding sustainable forest management; it makes our jobs easier when those unfamiliar with forest management know what we do, why we do it, and what we are really about. However, there is concern that too many resources may be spent in trying to reach private forest landowners currently not enrolled in MFL. We understand the need to solicit engagement by that group but we do not believe they should become the main focus of education and outreach efforts.

In order for forest certification programs on county forests to remain intact it is extremely important for the direct costs of that effort to be paid with forestry mill tax dollars. This is the current practice and we feel county boards would not be willing to take on those direct costs. It is understood that our county forests contribute extensively towards indirect costs associated with forest certification.

The Integrated Programs section of the Operations Plan has generated considerable discussion among the counties. We fully support enhanced integration but we strongly encourage the Division to incorporate county forest duties associated with time standards obligations into the PDs of as few personnel as possible. Approaching integration in this fashion would serve to ensure greater value in hours spent on our county forests and greater efficiencies in personnel. We understand county forest liaison positions will remain for all of our member counties and we want to stress the importance of keeping the focus of those positions on our county forest programs. We are concerned that if county forest duties are delegated to a larger number of personnel those individuals will likely be traveling from further distances to work on our forests and in that case travel time in lieu of hours on the ground will become an issue. We are fearful of having PDs developed that contain tidbits of county forest time. There is no doubt that personalities will come into play when the Operations Plan becomes the way of doing business and that signifies the importance of having the team leaders actually supervising personnel. We understand the intent is to have the team leaders become strictly supervisory and we hope that objective will be achieved as some counties have heard information to the contrary.

Y_____

<u>Comments to Visit in the Document</u>
1) **pg. 2, paragraph 2, "Industry Development"-** Industry development- very vague, what was wrong with utilization and marketing? There is no mention of working with agency foresters to understand markets and the needs of forest industry companies. Also, there's no mention of recruiting companies from outside the state for processes that could use underutilized resources.
2) **pg. 2, paragraph 6-** I would recommend doing a survey of post applicants and grantees to evaluate the program. I find this grant administration structure extremely cumbersome and not at all customer friendly.
3) **pg. 2, paragraph 7-** I would recommend looking at a cooperative structure with potential customers being the cooperative members.
4) **pg. 3, paragraph 6, "Forest Certification"-** Would recommend changing to "Forest and Harvesting Certification: Master Logger has FSC COC and will be part of the new FSC Group Certification program as well."
5) **pg. 5, paragraph 8-** I would hope that loggers are included in "professional" assistance. The Master Logger Program, GLTPA and earlier efforts of the Wisconsin Professional Loggers Association have helped elevate the logging profession to an active partnership role in Forest Management.

Z_____
Comments from the Bureau of Endangered Resources

[Editor's Note: The following comments were submitted in response to the Division's Operations Plan. However, there are many references to the Division's Strategic Direction and the Statewide Forest Strategy. We clarify this point to avoid confusion for other readers.]

Thanks for the opportunity to comment. Overall, the document is well-organized, well-written, and was clearly the result of a great deal of work over the last couple of years. As our comments were focused primarily on issues related to biodiversity, we did not address every section or statement in the document. There are at least 14 strategies from the Statewide Forest Strategy that are clearly consistent with BER goals, and we also looked to see how these were addressed in this document.

General Comments

- Regarding Strategy #11, the document makes only a brief mention of managing under represented forest types. Without more specific guidance from the division, under represented forest types and uncommon habitat for wildlife and plants may not be viewed as a high priority in the field. It is our feeling that the State Lands section should encourage the use of alternative silvicultural techniques on state-managed lands to conserve and increase underrepresented forest types. Encouraging the development of uncommon forest attributes can ultimately improve the retention of biodiversity within our forested lands. Also, more could be said, specifically, about efforts to increase forest structure and diversity (Strategy #13).

- State-managed lands provide unique opportunities for the use of extended rotations, as this is can be difficult on county and industrial lands where economics may be the primary drivers. The lack, and continued decline, of old forest was documented in the Statewide Assessment, and Strategy 12 calls for representing all successional stages. We feel that consideration for old-growth opportunities should maintain part of the conversation here if the situation is to improve.

- Although this issue may be too detailed to address specifically in the document, there are opportunities to link strategic directions. One example would be the maintenance of permanent deer openings which have implications for high deer numbers, as well as fragmentation – both are identified in the strategy and again in this document. If the indirect effect that forest openings can have, locally, on regeneration and biodiversity, is not well-understood, then perhaps it could be a research priority. This work could help with identifying forested areas that should be priorities for reforestation and elimination of forest openings.

- The nursery section contains good information about the need to evaluate where planting trees might (or might not) be ecologically appropriate. This discussion could be extended or repeated elsewhere to include a broader assessment of where to maintain cover types that are appropriate for the landscape (Strategy 15).

- There are many unknowns regarding climate change, but what species to favor where will be an important consideration in the future, especially for near-boreal species that are at the edges of the ranges. This should probably get mentioned somewhere in the text.

County Forests

- The changes outlined here seemed well-thought out and make good sense. BER recognizes the importance of the large acreage of county land holdings for Wisconsin's ecology, and it is encouraging that the division plans to continue supporting the counties.

- Will the reduction in grants mentioned in **CO-1** impact the counties abilities to manage for wildlife and rare species? Virtually all of the biotic inventory work conducted on county forest lands in recent years was done through grants. Unfortunately, biotic inventory information is sparse for the majority of the

counties, so any opportunity to collect biotic inventory information would be very helpful to both the counties and the department.

Forest Health

- As a general comment, "forest health" can be an ambiguous term, and from a biodiversity perspective would include broader considerations for all of the organisms that utilize the forest.

- We were encouraged that invasive species management will continue to be an important focus for the division, and we support statements **FH-1, 2, 3, and 4**. **FH-3** describes the division's commitment to partnering with other divisions and external partners; this is excellent. The outreach and education efforts described in **FH-4** should be also very helpful.

- Monitoring for invasive plants on state lands is one very important topic that is not specifically mentioned here. Is there an ongoing commitment to monitoring invasive plants on state forests? Early detection and control, as outlined in Strategies 22, 23, and 24 will be critical on our Northern Forests, for example.

Nurseries

- We strongly support the idea of well-thought out determinations regarding where to plant trees in the state, as well as the use of the Ecological Landscapes Handbook as a tool to assist with this process. However, some additional analyses may be needed beyond what is provided in the EL Handbook to focus this work and make it easier for foresters throughout the state to access. Does the division have a role in implementing this work, including communicating with the public as needed? If so, this could be added to one of the intent statements.

- Since there are clearly areas where planting should be avoided, does the division have a role in communicating this message, as well as where planting makes the most sense? It will be important for the department to have a clear message since there will be potentially conflicting objectives for any given area, particularly with the recent interest in planting trees in open areas for carbon storage.

- Finally, the monitoring described in **N-2** should be very helpful for future efforts. In addition to concerns regarding planting of trees in areas with major ecological values for other uses, there are also concerns regarding planting trees outside of their range, including red pine in most areas south of the tension zone. Will this be part of the monitoring and communication by the division? We recommend adding some text to **N-1** and/or **N-2** to discuss these issues.

Privately-owned Forest Lands

- We recognize the high importance of private lands for Wisconsin's biodiversity, and we support the division's proposed efforts to increase the ability to reach landowners who currently do not have management plans (**PF-3**). From our perspective, landowners should be presented with a full range of management options, including management targeted at uncommon forest types and habitat for uncommon species of wildlife and plants. Many private citizens feel a connection to, and want to enhance habitat for rare species of wildlife and/or plants. In addition to providing landowners with technical advice on silvicultural options for their property, it is important that they are also given a range of options that could provide habitat for uncommon species of both wildlife and plants. This can be achieved by including local WM and ER staff in future discussions with private landowners, and it warrants mention in this document.

- We also support the increased investments in conservation easements described in **PF-4**. Will "working forest" easements also be a priority? If so, some language could be added to **PF-4**. Although this type of easement may not provide the same conservation benefits as conservation easements, they may be an important part of the "toolbox," especially in regard to the increased parcelization of large forest landholdings. To maintain management options in the future, whether for timber management or conservation, it will be critical to maintain large forested blocks wherever possible (e.g. Strategy #5).

- With the increased reliance on Cooperating Foresters (e.g., **PF-2**), the department will continue to have an important role in providing them support. This should be explicit in the document. From the BER program's perspective, it will be important to be able to continue to provide guidance and training regarding rare species and High Conservation Value Forests, as well as other issues related to sustainable forestry.

- We are encouraged by the use of "targeted landscape scale management programs" outlined in this section. These efforts could be expanded to include other programs within the department or external partners to address Strategies 6 and 7.

State Lands

- As a general comment, some clarification is still needed regarding "allowable" harvests on state lands and how the data are used and interpreted. Although Act 166 effectively defined allowable harvests to mean "mandatory harvests," most of the old master plans were written with what was likely a very different interpretation. Going forward, it will be very important for master planning teams, and anyone involved with master planning, including the general public, to understand the true meaning of allowable harvest. Language could be added to the document to clarify what is meant by allowable cut, including a discussion of Act 166.

- The backlog numbers referenced in **S-1** can be artificially inflated in some cases. It is very important to ensure that the coding used for recon reflects the current management intent. As a recent example, numerous stands on State Natural Areas were found not to have the Z prefix that would remove them from the allowable cut calculations. This problem has been fixed, but there are likely many other similar examples. In addition, there are likely many stands that are small, discontinuous, and/or hard to access. This information is not clear in the final backlog numbers, and when summed, these small parcels could add up to very large acreages. What is the division's commitment to keeping the recon properly coded by removing deferral sites, consultation sites, SNAs, Native Community Management Areas, and other sites for which there is a reason to exempt from the backlog calculations? This could be added for clarification.

- We have some concerns over the use of consulting foresters to establish timber sales on State Lands. Will these sales be limited to certain types of stands? For example, we see how this might work for thinning a plantation or other types requiring less interpretation. However, we could foresee difficulties in Native Community Management Areas (NCMA). State Forest staff are familiar with their respective master plans, in many cases having served on the master plan technical teams. A private forester would not have the same level of familiarity with the plan, and that could lead to inappropriate management of NCMAs. In many cases, NCMA management is new and there are many unknowns. We encourage some clarification in the language for **S-1**.

- Regarding **S-3**, it would be good to mention the use of an analysis such as the one described in the nurseries section regarding where to encourage reforestation on state lands (mentioning that it will not be appropriate in some areas and will be guided by current department master plans).

- We request the following addition to the end of statement **S-4**: "visitor safety *and timber management, as well as the protection of plants, animals, High Conservation Value Forests, and important cultural resources.*"

- The proposed investment in assisting other programs with planning (**S-6**) is great news, and it would be good to have more information about how this would work.

Utilization and Marketing

- We support the continued investment in the FIA program described in **UM-2**. Although there are limitations to these data, they are our best source of information for certain uses.

Cross-Program Activities

- We ask that statement **CP-1** be clarified. Will the planned shift in endangered resources management be specifically related to Karner blue butterflies, or does this include other species? If it is only Karners, that could be explicitly stated, as well as what that shift will mean. There will likely be an even greater need for rare species support in the future related to the private forestry program, forest certification, master planning, and other issues.

- Regarding Karner blue butterflies in **CP-1**, the department has a large responsibility for Karner Blue recovery beyond the work on the HCP. The recovery program in Endangered Resources is primarily funded with soft money (gifts and grants) but has financial support from the HCP program. Dave Lentz currently covers all S-line expenses and funds one LTE for the recovery program. Without this support, the ER program would have to raise more funds to continue the work. Recovery is important for the HCP to be able to diminish efforts in long-term monitoring and possibly support a future de-listing effort for KBB.

- We strongly support the investment in research in **CP-2**, especially the information related to effects of deer on Wisconsin forests. Including a monitoring component could be invaluable for adaptive management since many of the impacts of our management on forest ecosystems are not currently monitored.

- We support the division's investment in third party certification mentioned in **CP-7**. Certification includes principles that contribute to several BER goals related to biodiversity.

- Of course, BER acknowledges the long-term partnership with the division and the things that we have been able to accomplish together. For example, biotic inventory and subsequent master planning efforts on state forests have set the standard used throughout the department, and joint efforts focused on invasive species have been very productive. We are encouraged by statement **CP-9** that the division plans to maintain assistance to other programs and to maintain important partnerships.

ZA_____
Wisconsin Urban Forestry Council

The UF Council met on November 4, 2011 at which time Darrell Zastrow provided an overview of the plan and hosted a question-and-answer period. We appreciate his remarks and generosity of time.
In 2007, the Council identified four strategic directions within our advisory report presented to the Wisconsin DNR. These include: manage the trees we have, plant more trees, increase biodiversity and facilitate partnerships and collaborations. We strongly believe the Strategic Direction Operational Plan outlines a

sustainable strategy in support of our recommendations. The Council would like to continue to serve an active role during the implementation of the plan.

We recognize and express our appreciation to you and Division of Forestry staff for engaging the Council with each step of the Forestry Strategy – Strategic Direction process beginning in 2007 with the creation of the sustainability framework. We look forward to continued involvement through the implementation process.

ZB_____
Wisconsin Arborist Association, Inc.

Having been extended the invitation to comment on this plan, The WAA Board of Directors felt it was important to give our feedback on the portions of the plan specific to Arboriculture and Urban Forestry.

After review of the proposed Operations Plan, the majority of the operations pertaining to Urban Forestry are included in three of the Specialized Programs; **Urban Forests, Forest Health and Industry Development**. In general the WAA is pleased to see that no significant changes will be made to reduce allocations or resources to these important programs. In fact it is very pleasing to see that additional resources and positions will be added to these programs to meet the needs of urban forestry professionals. With the emergence of Emerald Ash Borer and the ongoing threat of other invasive pests both plant and animal, the WAA finds the Forest Health Program a very important ally in detection, identification and management of invasive species.

This also can be reiterated for the Industry Development Program. Given the latest "Green" movement in today's society, it is ever more important for urban forestry professionals to find viable products for wood resources from the urban environments of Wisconsin communities. Gone are the days when land filling and whole tree chipping are considered to be best use practices for urban trees. Society is demanding that these trees and the woody by-products from them be utilized in marketable end products. The Industry Development Program of the WIDNR will play a vital role in identifying these markets and to also help facilitate the partnerships between the raw material providers and product producers. The WAA feels this is a vital and necessary role for the DNR Urban Forestry program to expand upon.

The WAA is very happy to see no decrease is proposed for the Urban Forestry Grant Program. With tough economic times for many municipalities, this grant program allows for many urban forestry programs to continue projects like; tree inventories, EAB management, and urban reforestation planting projects. The addition of a Partnership Specialist will hopefully identify and facilitate partnerships with organizations that stress the importance of trees in the urban environment such as the one the WAA has with the WIDNR.

In regards to the Supervisory and Organizational structures, it appears that the proposed changes will not have an adverse effect on the Urban Forest Program. The realignment of Regions/Districts also appears to streamline the structure of the Department without adversely affecting the services provided.

In closing I would like to reiterate the endorsement of the WAA for this proposed Operations Plan for the Division of Forestry specific to the Urban Forestry program. Thank you again for your time and attention to this matter.

ZC_____
From: USDA, FS, Forest Products Laboratory

We see that forests are a major strategic asset of both the State of Wisconsin and the United States and that state and federal government have important and appropriate roles to play in dealing with their maintenance, conservation and use.

Overall the Proposed Operations Plan is well thought out and addresses the major aspects and needs of the forest sector in the State of Wisconsin. As the Division of Forestry is building off its knowledge, programs, capabilities, expertise and organizational experience gained from decades of operation, the plan appears to us as both sound and appropriate.

My institution, the Forest Products Laboratory, is best suited to comment on issues related to Industry Development. We see that government has an appropriate role in fostering a robust forest products industry because the forest products industry is critical to our maintaining all the ecological, economic and social benefits people and society derive from our forests. In particular, a healthy and vibrant forest products industry enables us to: 1) maintain forests as forests by providing economic returns to land owners; 2) help reduce forest fragmentation and parcelization by keeping big blocks of forestland under single ownership; 3) offset the costs of forest management; 4) maintain the economic vitality of rural communities; and 5) economically utilize forest biomass that must be removed to improve forest health and condition.

We are pleased to see the Industrial Development Program is slated for increased human resources and activity. The types of activities described (e.g. providing information, guidance, and analysis regarding resource availability; helping match supply and demand; and having a focus on harvesting/transportation efficiencies and manufacturing improvements) are on target, appropriate, and necessary.

However, we at the Forest Products Laboratory see that: 1) the current forest products industry is overly focused on traditional high volume, low profit per ton products and 2) international competition, changing demographics, and competition from other substitute materials and technologies require that the forest products industry reinvent itself in the 21st century. This reinvention requires that the forest products industry move into areas such as the forest biorefinery to produce bioenergy and chemical feedstocks; nanocellulosic materials and products from wood; and value-added multifunctional green building materials for both residential and non-residential construction. To effectively deal with these coming changes, it is appropriate that Industry Development judiciously invest in capabilities to address emerging areas.

Lastly, we have found the co-location of Terry Mace of your staff at the Forest Products Laboratory very useful for cross fertilization of ideas and information and knowledge sharing. If as you implement this operations strategic plan it is of value to have additional of your staff in Industrial Development co-located with us at the Forest Products Laboratory, we would be delighted to discuss it further.

Once again, thank you for soliciting our input on your Operations Plan.

ZD_____

I support the efforts to undertake a thorough review of how resources are allocated within the Division of Forestry. A wholesale review of the workload, comparison against priorities, and an unbiased assignment of resources to field teams was needed. Hopefully this evaluation will resolve both perceived and actual inconsistencies in how staff time, equipment, and fiscal resources are allocated for the next 10-15 years.

While changes in forest resources have occurred over the last few decades across Wisconsin, larger changes have occurred in staff assignments, field work priorities, political support, and agency focus. Reallocation decisions should assign resources where they can provide public safety and assure long term success in conserving Wisconsin's private and public forest resource.

I offer the following comments to several proposals outlined in the Division of Forestry Operations Plan:

<u>General Comments</u>

1) The current organizational structure based on teams, team leaders, area leaders, and regional leaders is a strong system, well accepted by staff, and responsive to meeting both fire as well as forestry assistance needs in

Wisconsin. Work to better balance the field team sizes is appropriate. Large differences in team member numbers and complexity of program tasks exist. I want to emphasize that the *Team Leaders* hold crucial roles in this structure and need stronger appreciation of their function within the Division of Forestry. They provide the direct interface with field level accomplishments and problem solving for the Division. The success of the program pivots on these Team Leader positions.

Continue to use the existing supervisory structure, fill all team leader positions promptly, and encourage internal advancement to fill supervisory positions when they become vacant.

2) Rebalancing the size of the *Districts* is overdue. Perceived differences in supervisory oversight, management, and attitude overlooked the significant variation in field staff numbers, acres of forest resources served, and travel distances.

Continue with proposal to reach a reasonable balance in District field team position count.

3) Teams should be organized along county boundaries both for internal as well as external partner awareness. Splitting counties should be avoided. In particular, splitting Marinette County between two different teams appears to be the only Wisconsin county split and should be reconsidered. If including an entire county within the geographic boundaries of an assigned team is not possible, efforts should be invested by team leaders to identify issues of concern with the split county and seek crisp delineation of how the two teams will be accountable for the field assignments.

Avoid splitting counties between two field teams.

4) Recommend that several team names be changed to reflect a unique identifier for each team. On the proposed Forestry Supervisory Structure, some team names are duplicated: two *North* teams are shown as well as two *South* teams. Also there is a *West* team and an *East* team.

These names should be replaced with names of counties or a geographical feature that logically locates each team with the assigned territory in Wisconsin.

5) The proposal to assign more foresters to initial attack responsibilities is a good use of personnel and helps further integrate forest fire tasks within the forest management program. Assuming these positions will require the foresters to maintain both the fire qualifications and the required physical fitness level to safely respond to such fire emergencies, these positions should then be covered with similar protective status that is currently given to forester rangers. To require these positions to take on the same risks but without the protective status coverage for the hazards encountered by these positions is inconsistent.

As soon as possible, seek protective status determination for forester positions holding new or expanded initial attack fire assignments.

6) Assigning foresters to operate Type 4 engines is an innovation worthy to explore but it will present some new challenges to resolve. In particular, this concept blurs or erodes the conceptual differences between the tasks that define what a forester position is versus what is a forestry technician position: professional versus technical. This hybrid position could lead to unpredicted team dynamics and even more likely, some challenges in scheduling during fire season as WSP and WSEU labor contracts are interpreted by team leaders. Technicians may eventually pursue compensation review for performing comparable duties of higher compensated foresters.

Ask Area Forestry Leaders to gather potential issues and formulate guidance for team leaders as well as identify issues to address in labor relation discussions. Discuss and formulate guidance before assigning foresters to operate Type 4 engines w/tractor plows.

7) Reducing the number of law enforcement credential holders among initial attack forester rangers offers both pros and cons. Some pros include cost savings, increased proficiency by the designated law enforcement specialist, and increased flexibility for transfer by foresters without credentials into forester ranger positions. Negatives include reduced presence of law enforcement on initial attack incidents, potential for more confrontation by responsible parties towards initial attack personnel since there will no longer be an "officer" on the scene, and almost certain decline in law enforcement action pursued by the Division for forest fire violations.

I don't have enough information to strongly support or oppose this change recommendation but wondered if this should be tried on a smaller scale before implementing statewide?

8) Loss of the "back-up" equipment operator (Forestry technician) for each Dispatch group is disappointing since these positions helped cover vacancies, fill in employee emergencies, and provide work-rest relief for initial attack teams. Wisconsin's Type 4 engines with tractor plows are valuable suppression tools but with reduced trained personnel to operate these units, I expect more of these units will be idle when needed and fire losses grow.

As a compromise, reconsider assigning one back-up equipment operator (forestry technician) per District to float within the District to cover idle Type 4 engines w/tractor plows during staffing for fire suppression.

<u>Specific Geographic Issues</u>
9) Combining the 2 Areas into 1 Area along the central Mississippi River boundary helps provide better balance in staff sizes within Areas across Wisconsin. Similarly, dissolving the Waupaca Area and assigning portions to adjoining Areas improves efficiency and consistency of Area level responsibilities across Wisconsin.

Continue with proposal to reduce and consolidate identified Area structures.

10) Loss of a Visitor Services Associate or similar staff position at the Flambeau River State Forest is not appropriate. The Flambeau RSF is Wisconsin's 2nd largest state owned property and a staff person to assist with citizen inquiries and office management is needed. Assigning such clerical duties to foresters, law enforcement rangers, or the Forest Superintendent is inefficient and not consistent with how such duties are handled either on other recreational properties or central office programs. It appears that the NHAL SF appropriately have 2 VSA positions assigned to assist with clerical duties on this large property and the smaller Black River SF also has 1 VSA assigned. But none is currently assigned to the Flambeau. The Flambeau RSF is not near a WDNR Service center where such clerical duties could be handled by such staff. The existing VSA position was a partial FTE and has more value than partial FTEs elsewhere in the program such as the state nurseries where contracting for services could be employed.

Reconsider assigning a VSA position to the Flambeau RSF.

11) Under this proposed operations plan, the Washburn Team loses two forestry technician positions (1 @ Spooner and 1 @ Minong) leaving four forestry technicians on the Team (2 @Spooner and 2 @ Minong). Due to the highest fire landscape classification, the Washburn team appropriately retains 5 Type 4 engines w/tractor plows but only has 4 forestry technicians assigned to operate this initial attack equipment. When comparing the Washburn team with the Juneau/Wood Team with a lower fire risk landscape, the Juneau/Wood Team has 7 Type 4 engines and 7 forestry technicians assigned to operate this equipment. And there is a one to one match of forestry technicians with an assigned Type 4 engine proposed for the Douglas Team. A Type 4 engine should

have an assigned operator who is responsible and accountable for the readiness of the unit. Part time or seasonally assigned personnel isn't appropriate.

Two of the largest forest fires in Wisconsin in the last 40 years occurred in Washburn County (Five Mile Fire and the Oak Lake Fire). Both of these fires were many times larger than the Cottonville Fire.

Retain 3 forestry technicians at Spooner.

12) Loss of a Washburn Team forester as well as a technician will reduce time available for county forest and state lands management in Washburn County. Retaining the 2nd Barron forester in addition to the forester coverage already available with 3 foresters serving Barron and Polk Counties appears to be excessive. Greater needs occur within the team in Washburn County.

Reassign the 2nd Barron Forester position from Barron to Spooner to help with the larger needs in Washburn County. This would be a reassignment within the Washburn Team in the proposed operations plan.

13) Combining the Ladysmith East and Ladysmith West FRU into one Ladysmith FRU has created a very large FRU which includes all of Rusk County, portions of eastern Barron County, and a small part of northern Chippewa County. This can not be adequately covered by one Type 4 engine during the spring fire season and shifts the burden of initial attack onto small, rural fire departments in Rusk and Barron Counties. Loss of the 3rd Type 4 engine at Spooner will further reduce assistance from Cumberland Dispatch group to help Ladysmith Team with response for eastern Barron or western Rusk Counties.

Was the size of the new Ladysmith FRU appropriately considered?

14) Industry Development specialists assigned to field locations is overdue and will strengthen credibility with improved responsiveness to forest resource inquiries. But is there sufficient work to keep 3 specialists fully productive with these identified tasks. What basis was used to conclude that 3 FTEs were needed now?

To assure that these positions are fully utilized, I recommend that these specialists also hold some obligation to assist with field level forest management tasks to deepen their awareness of related issues beyond just the forest product processing industry so that they hold frontline knowledge in timber sale establishment, bidding, product utilization, sale administration, and other routine issues involving the field work to provide roundwood or forest products to the processing plants. These specialists should also take on the forest certification workload typically shifted to field staff. These specialists should be proficient in all issues related to growing, harvesting, and marketing certified forest products.

15) I don't support a new position for Genetic specialist. These duties were in the past included as part of the Nursery and Tree Improvement Coordinator and a second position is not needed. This is a luxury and is better provided by the University on an as needed basis.

16) Forest health specialist coverage in northwestern Wisconsin appears to be understaffed in comparison to 2 FH specialists in the west central District and 3 FH specialists in the Northeast District.

Recommend assigning FH specialists equitable proportions of Wisconsin's forest land to monitor and provide assistance and not rely on new District boundaries.

17) Managing State Forests as part of the supervisory structure within each District should continue as proposed. Management of State Forests is an important part of field level responsibilities and maintaining supervisory responsibilities within Area Teams is vital to successful field level integration of assignments.

I strongly support including State Forest Teams as part of the Area/District level supervisory structure.

18) Cooperation with Wisconsin's County Forest program must continue and should target areas that strengthen the relationship. The Division should reevaluate the continued erosion of technical assistance to Wisconsin's largest public forest resource held in these 29 County Forests. Counties continue to express strongest interest in skilled technical assistance from WDNR with field level management activities. The County Forest-WDNR relationship has a long history and has earned national regard as a great program. But the softening in the Division's commitment and declining willingness to provide the desired assistance will instead encourage the county forests to pursue other options. The Division is increasingly viewed less as a partner but more as an auditor focused on "regulating" the management of these forests and less interested in helping shoulder the day to day efforts to manage these lands. I'm concerned that the county forest program will actively seek new autonomy to independently steer their own course. Such a separation would be a net loss for the Division and Department. The Division needs the county forests as much as the county forests want WDNR help. WDNR foresters need the hands on experience provided when regular, dependable, and active participation by Division's employees occurs. State lands do not provide enough forest management activities to help field staff maintain firsthand experience and development of forest management proficiency. Offers to County Forests to substitute fiscal resources for WDNR field resources is a slippery slope and helps the County Forests build a case to politically transfer to them the fiscal value of WDNR commitments as well as the ability to then operate independent of the Division.

Re-evaluate the declining field level commitment towards Wisconsin's County Forest program. Many decision makers within the Department do not understand the full value or impacts of Wisconsin's County Forest Program to this state's natural resources base.

19) The Division should reevaluate the compensation provided to rural fire departments for assistance in suppression of forest fires. In portions of the State, fire departments are beginning to balk at WDNR requests for assistance since compensation rates are out of date and the grant program becomes more restrictive. Importantly, there is significant inconsistency across the state on how the Division compensates rural fire departments. Any effort to renew the Memorandum of Understanding with local fire departments clearly needs to include a chance to refresh the compensation rates as well as other provisions.

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Great Lakes Indian Fish & Wildlife Commission

The Voigt Intertribal Task Force (VTF) of the Great Lakes Indian Fish & Wildlife Commissions (GLIFWC) submits the following comments on the Operations Plan for the Strategic Direction proposed by the Wisconsin Department of Natural Resources' (WDNR) Division of Forestry. These comments are being submitted pursuant to the authority delegated to the Task Force by its member Tribes from the perspective of the Tribes' treaty-guaranteed hunting, fishing and gathering rights within the Ceded Territories, and are intended to complement comments offered by the Tribes in their individual sovereign capacities.

The WDNR has recognized the Tribes' treaty-guaranteed hunting, fishing, and gathering rights. However, the Strategic Direction as well as the Draft Operations Plan (designed to meet the intent of the Strategic Direction) should acknowledge these treaty-guaranteed rights with a specific statement to that effect.

The Task Force's primary concern is the document's failure to recognize that the exercise of treaty rights is a part of the natural and necessary processes that occur within Wisconsin's forests and is, in fact, an element of sustainable management. There is currently a major effort underway to implement treaty gathering rights on State properties, and this increased effort on the Tribes' part as well as the WDNR's part warrants inclusion in this plan.

Secondly, the tribes' exercise of gathering rights on State properties largely consists of the gathering of non-timber forest products (NTFP). There is no mention of NTFP in this Operations Plan. There is insufficient information on amounts available, amounts harvested, sustainability of harvest, compatibility of harvest with other uses as well as best management practices on the harvest of NTFPs. This is a considerable oversight.

Lastly, as suggested during the drafting of the Strategic Direction, and similarly for the Operations Plan, the WDNR Division of Forestry should include a statement which specifies that nothing in this plan shall in any way infringe upon the tribes' existing treaty reserved rights.

The Task Force is optimistic that the WDNR staff will continue to work with Tribes and GLIFWC staff to further improve the Operations Plan. The opportunity to submit these comments is greatly appreciated, and the Task Force looks forward to continued consultation on this document and others in the future.