

RESPONSE TO COMMENTS

RECEIVED ON THE DIVISION OF FORESTRY'S

DRAFT STRATEGIC DIRECTION

EXPLANATION OF REVISIONS

The DRAFT Strategic Direction was sent to partners, the public and staff to review on December 17, 2010. Comments were reviewed by the Forestry Leadership Team and considered when revising the document. This document explains a) why changes were made, b) defines terms and clarifies concepts that reviewers found confusing, and c) discusses intent statements and decisions that received a lot of comments but were not changed. Two versions of the final Strategic Direction are posted on line. One copy shows the edits that were made and the other shows a “clean” copy with all changes made.

Revision to introduction:

The Forestry Leadership Team (FLT) used a set of guiding principles when developing the Strategic Direction. The guiding principles are now listed and explained in the introductory section of the document. Some of the content in the ‘Why Wisconsin Forests are Important’ section in the draft was incorporated into the guiding principles.

The ‘Public Comment Process’ section was changed to explain how the Division gathered input on the Strategic Direction and how FLT used and responded to reviewers’ comments. Also added was a ‘Next Steps’ section.

RESPONSE TO COMMENTS

OVERALL

- O.1. Comment:** The Division should ensure that the technical competence of its staff is maintained.
- Response:** FLT agrees and believes maintaining technical competence of our employees is critical in achieving the strategic direction. Skills are acquired through technical training sessions via in-services, workshops, conferences etc. These skills are then applied and honed through experience and practical application in the varying forestry program duties and responsibilities.
- O.2. Comment:** The Division should utilize partnerships in a manner that honors a true partnership in that investments, decision making and work are all shared and not solely administrative or regulatory.
- Response:** Collaboration is important to successful implementation of partnerships throughout the entire Division. However, given the breadth and

diversity of the partnerships we are involved with, our role varies. In some cases we are in an oversight or regulatory role whereas in others we are one of many at the table. No matter what our official role, we recognize we will be more successful if we view partnerships as collaborative efforts.

O.3. Comment: The Division must be more integrated. Personnel and resources must be expected to work all aspects of forestry. The use of fire program personnel in regards to their contribution to forestry management activities and vice versa remains inconsistent across the state.

Response: In the operational phase we will be assessing the relative workload needs and will allocate resources based on that need. The Division will need to staff the highest priority activities to successfully implement the Strategic Direction. In order to do this effectively and efficiently, most staff will have to work across divisional programs. Single program specialists will be used only when it is more efficient to do so. The operations phase will help us identify the instances where this will happen. We also anticipate that as the Division's work continues to evolve, work priorities will shift and as a result the amount and type of cross program work staff does will also change.

COUNTY

Text was added to the introduction and 'Challenges and Opportunities' section to better describe the benefits that County Forests provide.

Draft Role Statement:

The Division works in partnership with the 29 counties with land entered under the county forest program to ensure these forests provide the full array of public benefits. In exchange for county commitments to manage their land sustainably and consistent with the state law, the state invests resources in each county to facilitate that county's ability to contribute to the local and statewide economies, provide an array of ecological services, and provide a land base on which the public can recreate. The Division is proposing to shift the manner in which the state provides assistance to the counties under this program, providing a greater degree of flexibility for individual counties to select among an array of resources that best meet their needs.

Revised Role Statement:

No significant changes.

Draft Intent Statement:

Text was added (first paragraph of the section leading into the intent statement) to better explain the intent of FLT that the reduction of investment by the Division will be partially offset by the anticipated increase in flexibility in the use of funding enabling the counties to more efficiently use the resources received from the state.

Proposed Change: The Division will continue to provide a suite of services and support to counties in order to maintain the excellent partnership that has been developed. The Division is proposing to shift the manner in which the state provides assistance to the counties under this program, providing a greater degree of flexibility for individual counties to select among an array of resources that best meet their needs. The Division is also proposing to modestly reduce the investment in time and/or grants and increase the assistance provided to counties in support services (e.g. IT, GIS, consultative services, and land acquisition). (CO-1)

Revised Intent Statement:

Program Change: The Division will continue to provide a suite of services and support to counties in order to maintain the excellent partnership that has been developed. The Division will shift the manner in which the state provides assistance to the counties under this program, providing a greater degree of flexibility for individual counties to select among an array of resources that best meet their needs. This will result in a reduction in the direct investment to counties. The Division will increase the assistance provided to counties in support services (e.g. IT, utilization and marketing, and support for land acquisition). (CO-1)

Reason for Change of Intent Statement:

The intent statement was changed to more clearly indicate the Division would be reducing its direct investment to the counties.

Comments and Responses:

CO.1. Comment: The Division should continue to provide field time to the county forests because it is essential to the overall health of the county-state partnership. The Division should not just have an administrative or regulator relationship with county forests.

Response: FLT believes that the county forest liaison position is critical to maintaining the county-state partnership. The amount of field time provided by DNR staff will be discussed with each county as part of the assessment of priority services desired by each county.

CO.2. Comment: There is skepticism that increasing investment in Information Technology services (IT) and Geographic Information Systems (GIS) will directly benefit the Counties.

Response: Not every aspect of IT/GIS investment will directly enhance the counties, though some clearly will (e.g., WisFIRS). Other investments will indirectly benefit the counties as part of the larger forestry community.

CO.3. Comment: Reviewers supported providing a ‘suite of services’ and support to counties, but many questioned how this will be done or the level of flexibility.

Response: FLT understands this change in the manner in which we provide services to the counties will require significant effort to implement. Many of these questions will be answered in the operations plan which will determine how the Strategic Direction will be implemented. Additionally, FLT will work with the Wisconsin County Forest Association and member counties to formulate the best approach to implement this change. It is anticipated that implementation of the change will be phased, allowing for evaluation and readjustment.

CO.4. Comment: Reviewers expressed concern that providing a ‘suite of services’ is in actuality a way for DNR to do less county work.

Response: The Division’s increased investment in services will directly benefit counties by supporting the continued development and ongoing maintenance of products and tools that save the counties time and increase their efficiency and effectiveness. We define services broadly and include things such as forest health monitoring, market and industry evaluation, as well as information technology. Not every county is at the same level, but all benefit by some of the following examples.

- The WisFIRS application meets a large percentage of the counties’ database needs, (We recognize that some counties have developed their own system to meet their needs.)
- The WisFIRS application has allowed users to more easily find errors in the data and correct them – a process that previously would often take days. Also a

secure backup mechanism for their data – if county computers crash, this system operates as a backup.

- Maintenance, support, and training for GIS and application systems (e.g. WisFIRS). For some of the counties who can't maintain an ESRI license, WisFIRS will allow them to manage their GIS data without a GIS site license, saving them money each year.
- Access to GIS layers (fire occurrence, MFL lands, etc), to NHI checks, and in the future maybe cultural resources.
- Time savings with timber sales automation (severance tax/invoicing).
- DNR air photos offered at no cost. (We recognize that some counties fly their own photography.)

The Strategic Direction does reduce the amount of direct investment to the county forest program. Since the framework for this change has not yet been implemented, it is not yet known how the investment will be reduced in respect to funding versus DNR staff time.

CO.5. Comment: Reviewers expressed concern that managing at a landscape scale¹ should not come at the expense of the counties autonomy to manage resources (e.g. annual allowable cut) as they deem appropriate.

Response: The Strategic Direction identifies the opportunity for counties to manage at a landscape scale due to their significant size of ownership and distribution across the state. The direction each county takes will be based on what they determine is the most appropriate for their county. There is no intent to mandate the counties manage at a landscape scale or require specific management prescriptions at the property level, rather landscape considerations are naturally part of the county forest management opportunities since they own much of those landscape.

¹ The counties managing at a landscape scale is referenced in the Strategic Direction on page 5 in the third paragraph under Challenges and Opportunities.

FIRE PROTECTION

In response to comments, the introductory text was revised to reflect the importance of fire in the management of fire dependent ecosystems. See comment FP.2.

Draft Role Statement:

The Division's role in forest fire protection is to prevent, detect and rapidly suppress wildland fires in areas of the state that have the greatest potential for significant loss of property, natural resources and even lives due to wildfire. The Division complements the capacity of local fire departments by filling roles (e.g., Incident Management Teams, heavy equipment) not efficiently covered on a community by community basis. The Division is proposing to allocate resources based on an updated assessment of risk as defined by fire landscapes in Wisconsin, and enhance efforts in fire prevention and risk mitigation.

Revised Role Statement:

No significant changes.

Comments and Responses:

FP.1. Comment: The Division provides important fire protection support to local communities by filling roles (e.g. wildland fire experts, Incident Management Teams (IMT), specialized heavy equipment, etc) that are not efficiently covered by fire departments. On the other hand, fire departments complement the capacity of the Division by filling roles (e.g. trained firefighters, suppression equipment, structural protection branch staffing and services) to maintain an effective and efficient partnership in wildland fire protection. This shared endeavor with fire departments is truly based on person to person relationships. Forest rangers and technicians interacting with fire department personnel at meetings, trainings and fires are where respect is built in each other. Expecting performance and effectiveness on wildland fires without such relationships is unrealistic.

Response: FLT recognizes the critical aspect of this relationship between the department and fire departments in the successful implementation of the Division's Strategic Direction. The Division is maintaining its contribution to fire departments through training, Forest Fire Protection (FFP) grants, participation in county association meetings, etc.

FP.2. Comment: Fire ecology should be addressed in the Strategic Direction specifically prescribed fire, a Let Burn Policy and modified suppression strategies.

Response: FLT agrees that fire ecology should be referenced in the Strategic Direction and modified the introductory text of the Fire Protection program to reflect this. Prescribed fire is an important tool for land management. The Division's role is to suppress wildland fires while providing regulation and encouragement for the use of controlled fire to achieve ecological outcomes.

FP.3. Comment: There needs to be clarity on when the Division's fire protection staff are going to respond when fire risk is low/moderate.

Response: FLT agrees that our partners need to have a clear understanding of our staffing procedures and response to actual fire incidents. Staffing guidelines have been developed, implemented and are being refined this year. FLT's intent is to more clearly articulate the fire response expectations for department personnel based on staffing guidelines, actual staffing situations, time of year, fire danger, etc. and communicate these expectations with our partners, including fire departments.

Draft Intent Statement:

FP-1 Proposed Change: The Division will utilize fire landscapes to allocate resources based on level of hazard. This change reflects an update to the way the program focuses investments with new tools and updated data. (FP-1)

Revised Intent Statement:

No significant changes.

Comments and Responses:

FP.4. Comment (1): Resources should not be reduced in lower priority organized protection areas in order to increase investments in the Cooperative Protection Fire areas.

Comment (2): The Division should not increase investments in areas of Wisconsin where DNR suppression resources are not currently stationed by reducing resources in intensive and extensive areas. This reduction shifts the burden onto local municipalities, especially rural volunteer fire departments, which are already struggling to maintain firefighters and adequate funding.

Response: Overall comments supported the concept of the fire landscape map and allocation of resources based on values at risk. FLT affirms our intent to allocate resources based on values at risk as articulated by the fire landscapes within the Fire Assessment. Additionally, FLT is committed to updating the fire landscape analysis used to determine the fire landscapes as data become available.

Since it has not yet been determined how the Strategic Direction will be implemented, it is unknown how resources will change in the fire protection areas. However, to be clear, the Division will not walk away from its responsibilities in lower priority fire landscapes within organized protection, rather the amount of resources it devotes or the level of suppression response may be reduced.

FP.5. Comment: The Fire Department Advisory Council supports expansion of the cooperative fire program to more effectively address wildland fire problems and improve wildland fire protection capacity outside the DNR protection areas.

Response: N/A

Draft Intent Statement:

Proposed Change: The Division will strengthen highly-effective prevention and mitigation programs such as the Wildland-Urban Interface program. Prevention programs will be integrated into a Division-wide strategic plan for education and outreach and will be evaluated to understand the cost savings they provide by reducing the numbers of fires. (FP-2)

Revised Intent Statement:

No significant changes.

Comments and Responses:

FP.6. Comment: The Division should consider eliminating the Emergency Fire Warden (EFW) program

Response: The Division is transitioning to a new electronic burning permit distribution system. Businesses will continue to be used as EFW's in high priority landscapes. These EFW's will be aimed at servicing high concentration areas of users.

FP.7. Comments: The Division should be stricter on allowing burning during spring fire season; use electronic burning permit program to limit burning to the safest days (i.e. when its raining); enact a black-out period from the time that things 'get dry' until green-up, regardless of the weather; legislation to ban debris burning—burning barrels.

Response: The Fire Program Assessment Team and FLT have discussed the pros and cons of these potential options for burning restrictions, along with many others. FLT feels that the electronic burning permit system allows the greatest customer service, yet provides a mechanism to immediately address changing fire conditions by eliminating burning as conditions warrant.

FP.8. Comment: Overall participants supported strengthening the fire prevention program.

Response: N/A

FP.9. Comment (1): The Division should maintain some type of prevention program geared toward our youth audience.

Comment (2): Support the expansion of forest fire prevention themes into fire department school program efforts. The necessary support through prevention themes, scripts, ideas and supplies from the Division are all that is needed to share this efficient effort.

Response: As stated in the Strategic Direction, the prevention program will be integrated into a Division-wide strategic plan for education and outreach. This effort will help the Division determine where and how it will focus its education efforts.

Draft Intent Statement:

The text explaining intent statement FP-3 was modified to more accurately explain the intent of FLT in regards to how resources will be allocated.

Proposed Change: The Division will shift resources within the state in order to more efficiently prepare for, detect, and suppress forest fires. The Division's investment will be reduced in lower risk areas. (FP-3)

Revised Intent Statement:

Program Change: The Division's investment will be reduced and resources will be placed within the state to more efficiently prepare for, detect, and suppress forest fires with emphasis on high risk areas. (FP-3)

Reason for Change of Intent Statement:

Comments received by FLT thought that "shifting" resources reflected a temporary situation. The change was made to clearly articulate that there will be an overall fire program investment reduction and the allocation of the remaining resources will be based on the values at risk within the fire landscapes.

Comments and Responses:

FP.10. Comment: What is 7 day scheduling?

Response: Currently, seven day scheduling is widely used within the Department and the Division to schedule personnel to serve each day of the week, not just Monday through Friday. Within the Division it is used extensively with the state forest recreational and law enforcement programs. FLT feels the emergency nature of forest fire control lends itself well to seven day scheduling during the spring forest fire season.

FP.11. Comment: If the cooperative areas are a high risk, why are they not in an extensive or intensive area to begin with? Seems to make more sense to incorporate these areas into the protection areas.

Response: FLT and the Fire Assessment agree that high risk landscapes not currently in organized protection should be considered for inclusion within organized protection if the local units of government are interested and it makes sense for the Department's administration of the fire program.

FP.12. Comment: Some reviewers disagreed with "Investment will be increased in cooperative protection areas" and suggested rewording this sentence to include having a dialogue with local units of government, along with a study of fire history in these areas, to see if DNR staff investment is actually justified

Response: Allocation of resources will be based on the level of risk and hazard which, to the extent possible with available data, will use fire history as one of the factors. The Division will engage local units of government when making adjustments to protection resources.

FP.13. Comment: The Division should consider eliminating fire towers in all but the most critical fire landscapes.

Response: The Division has continually evaluated our investment in fire towers and significantly reduced the forest lookout towers staffed. Towers currently staffed are in high priority landscapes or in remote areas where citizen reporting is deemed unreliable due to low number of persons in the area. The staffing of existing fire towers is relatively inexpensive (\$1200 annually). When a tower needs replacing, we will evaluate the replacement cost (\$150,000) against the benefit received.

FP.14. Comment: Overall support for establishing local short Incident Management Teams (IMT) for rapid response and regional expanded IMT for extended attack fires. This is seen as an immensely important service provided to communities struggling with natural disasters. Division IMTs are the experts recognized statewide to assist in the management of large scale or complex incidents outside the capabilities of local governments.

Response: The reason Division IMTs are the experts is the training and the preparedness the Division has invested in these teams. In order to continue to provide this important service to communities, the Strategic Direction affirms the importance of IMT team training and individual position training. Preparedness is the key to success.

Draft Intent Statement:

The text explaining FP-4 was revised to provide better clarity.

<p>Proposed Change: The Division will eliminate exclusive use contracts for the SEAT program. (FP-4)</p>

Revised Intent Statement:

No changes.

Comments and Responses:

FP.15. Comment: Overall comments supported the proposed change to eliminate exclusive use contracts for the Single Engine Air Tanker (SEAT) program.

Response: N/A

FP.16. Comment: In the past, the Division used “call when needed (CWN)” aircraft. It was very expensive and aircraft are not available when they were needed. It was cheaper to go to exclusive use contracts. Why shift back to CWN contracts?

Response: FLT feels that despite SEATs being an effective tool for fire suppression, the investment required to make them available is not justified by the overall program benefit provided in these times of constrained resources. This same sentiment was articulated in the Fire Program Assessment. The prior CWN contracts utilized by the state were based on the federal SEAT contract. Currently, the Wisconsin DNR has developed a CWN SEAT contract that is exactly the same daily and hourly flight cost as the current exclusive use contract. The only difference is that in the CWN contract the department is required to pay for the ferrying cost of the aircraft to Wisconsin. Utilizing the CWN contract will allow the Division to be more flexible and responsive to changing fire conditions and therefore save resources during times of lower fire danger levels.

FP.17. Comment: Overall comments supported the Division aircraft and pilots providing air resources as platforms for fire detection, intelligence gathering and as a safety lookout for all firefighters.

Response: N/A

Draft Intent Statement:

Maintain Program: The Division will maintain its current investment in providing FFP grants to local fire departments to assist in suppressing and preventing wildland fires. (FP-5)

Revised Intent Statement:

No changes.

Comments and Responses:

FP.18. Comment: Many rural fire departments have maintained cooperation with the DNR under outdated Memoranda of Understanding (MOUs), but are rapidly realizing that the reimbursement rates do not reflect current costs. Some are beginning to perceive this as a shift of DNR responsibilities and costs indirectly onto local fire departments and municipalities.

Response: The responsibility for wildland fires is a shared responsibility between the Department and fire departments. The MOU reimbursement rates were never intended to reflect the costs of operations for fire departments. The Department intends to maintain the overall investment in fire departments (fire suppression, Forest Fire Protection (FFP) grants, training, etc.) in the Strategic Direction, and work with the Fire Department Advisory Council to determine the specific areas and levels of this investment.

FP.19. Comment: Better collaboration and a good working relationship with other fire agencies within the state are essential and needed for effective fire management. It is essential to have good working relationships with these agencies.

Response: FLT recognizes the importance to everyone's success of maintaining and strengthening the relationship with other agencies with fire suppression responsibilities in Wisconsin. This not only includes fire suppression capabilities, but joint training, utilization of closest resources concept, IMTs, etc.

FP.20. Comment: Overall comments agreed that the mutually beneficial relationship between the Department and the fire departments is a critical component of the Wisconsin wildland fire program

Response: N/A

FP.21. Comment: There were two conflicting opinions expressed regarding FFP grants:

(1) FFP grant priority should be shifted away from Volunteer Fire Departments that charge for all initial attack wildfires towards those who provide assistance at no cost.

(2) Portion of the grant program should be reallocated to increasing the reimbursement rate for fire departments that accept a new, updated MOU. A portion of the grant should still be allocated for vital forest fire safety items.

Response: In the Strategic Direction FLT intends to maintain the overall investment in fire departments (fire suppression, FFP grants, training, etc.), but work with the Fire Department Advisory Council to address how best to allocate this investment.

FP.22. Comment: The Fire Department Advisory Council (FDAC) would like to strengthen the investment in the FFP grant program. The FDAC would like the Division to support the past state funding level (\$448,000) of the FFP grant program. These grant monies directly affect the capabilities of local fire departments in the initial attack of forest fires. Those FFP dollars are matched dollar for dollar by fire departments again reflecting the nature of this valuable wildland fire protection partnership.

Response: FLT affirms its commitment to maintain the current investment in the fire department partnership. The Division, in consultation with the FDAC, will determine how best to distribute these resources when the strategic plan is implemented.

FP.23. Comment: Continuing grant programs and training opportunities are great ways to better equip fire departments to meet their needs for involvement in wildfire suppression efforts.

Response: N/A

Draft Intent Statement:

Maintain Program: The Division will continue to fund training as a basic function of the fire protection program at current levels. (FP-6)

Revised Intent Statement:

No Changes.

Comments and Responses:

FP.24. Comment: Overall reviewers support the maintenance of training of fire department members to be effective in emergency response and maintain safe operations on wildland fires.

Response: N/A

Draft Intent Statement:

Maintain Program: The Division will maintain current investment in fire safety and law enforcement efforts. Working together with partners to improve firefighter and citizen safety is and will continue to be the Division's highest priority. (FP-7)

Revised Intent Statement:

No changes.

Comments and Responses:

FP.25. Comment: Overall reviewers support maintaining safety and enforcement at current levels.

Response: N/A

FP.26. Comment: Overall reviewers agree that safety of firefighters and the public is the top priority in the fire protection program.

Response: N/A

FP.27. Comment: The Division should consider increasing its investment in safety. The hazards of fire suppression appear to be increasing, or at least our understanding of some of the hazards is becoming better understood. Smoke exposure and physical fitness are important items that directly impact firefighter as well as public safety

Response: FLT affirms our commitment to safety as a priority. Resource investment to address hazards in the fire environment is an operations issue and will be addressed in that process.

FOREST HEALTH

Draft Role Statement:

The Division's role in forest health is to provide technical expertise in the prevention, detection, assessment, management and monitoring of invasive plants, insects and diseases that damage trees and forests, and the benefits they provide. The Division is proposing to maintain its capacity to assist public and private forest landowners in their efforts to minimize the establishment and adverse impacts from destructive forest insects and diseases, particularly non-native invasive species and invasive plants.

Revised Role Statement:

No significant changes.

Comments and Responses:

FH.1 Comments: The overall investment in the Forest Health Program should be increased.

Response: FLT affirms our intent to maintain current investment levels. Given the range of responsibilities the Division has, FLT believes the current investment is appropriate given the full range of work that needs to be done by the Division as a whole. However, although the Division will maintain our overall investment in forest health, we will continue to increase our emphasis on more damaging invasive species and transition staff to be more forest health generalists rather than specializing in a particular species.

FH.2 Comments: Overall there was strong support for a robust forest health program.

Response: N/A

Draft Intent Statement:

Proposed Change: The Division will continue the recent shift in investment toward increased emphasis on invasive species work. There will be a continuing focus on emerging priority needs with a reduction in gypsy moth suppression efforts. (FH-1)

Revised Intent Statement:

No change.

Comments and Responses:

FH.3 Comment: There was overall support for the increased emphasis on invasive species; specifically detection and control work.

Response: N/A

FH.4 Comment: Many reviewers expressed agreement with the shift of investment away from Gypsy Moth control to other emerging priorities.

Response: Also see F.5

FH.5 Comment: The Gypsy Moth program should not be reduced.

Response: FLT affirms the reduction in the Gypsy Moth program. However, this will be done by transitioning from a state run cost-share program and state contracting for aerial spraying to one where the state provides administrative services (tracking cost share activities and performing other associated paper work) for anyone receiving funds. Recent work with Department of Agriculture to develop guidance and printed materials for local communities to assist them in suppression efforts will help this transition. We have already limited suppression efforts by prioritizing suppression spray areas and setting maximum workload levels that staff can accommodate. The reduction in Gypsy Moth suppression efforts will be phased in over time as infestations spread across the state. This will enable shifting the work to more critical and damaging invasive species.

FH.6 Comment: A possible outcome of diminished effort on Gypsy Moth control may be public reaction to defoliation of aspen and oak and other detrimental impacts from the caterpillars. There will be a strong need to address this issue in public messages about forest management trade-offs and approaches.

Response: An intent expressed in the Strategic Direction is to develop a specific assessment and strategic direction plan for our roles in education and outreach across the entire Division. Forest health focused education and outreach will be evaluated as part of this process.

FH.7 Comment: Support for downsizing efforts such as jack pine budworm surveys or efforts by forest health staff dealing with garden insect problems or ornamentals that pose little risks to Wisconsin's forests. Shift efforts towards other higher concern invasive species that will cause large scale problems in the forest.

Response: FLT agrees and it is reflected in the intent expressed in the Strategic Direction.

FH.8 Comment: There was overall support for the increased emphasis on invasive species.

Response: N/A

FH.9 Comment: There should be more of a push to compel landowners to take action on invasive plants even though stronger government control and regulation is not likely these days.

Response: Recently enacted Administrative Code NR 40 is an example of a more proactive approach being taken to compel action on the most harmful invasive species. The Division is working with partners to first emphasize awareness and education to gain voluntary compliance. Several training and outreach efforts have already occurred with special emphasis on “best management practices for invasive species”. NR 40 focuses on the most critical and damaging invasive species.

FH.10 Comment: Could the time the Forest Health staff spends on native insects and diseases be covered by the private sector (e.g. diagnosing pest problems for individual landowners)?

Response: By shifting emphasis to invasive species there will be considerably less time spent on non-invasive native insects and diseases by DNR forest health staff. Also, the recent forest health study identified a few consultants interested in doing surveys, but little interest in diagnosis work.

Draft Intent Statement:

<p>Maintain Program: The Division will continue to provide detection, delimitation, monitoring, and impact assessments of invasive plants and highly damaging insects and disease-causing organisms and expand risk model and map development. The technical assistance the forest health program provides to partners and land managers is critical for them to make appropriate management decisions. (FH-2)</p>

Revised Intent Statement:

No Change.

Comments and Responses:

FH.11 Comment: Investment in monitoring should be further increased.

Response: FLT affirms its intent to maintain its investment in monitoring mainly due to the recent increase in investment in our invasive species work which includes monitoring and tracking. An example of this is the increased work in risk model and map development for the last five years. The intent of FLT is to maintain this shift.

FH.12 Comment: Forestry should increase investment in eradication efforts.

Response: FLT believes increasing our investment in eradications will not be the best use of our limited resources since it is rarely successful (e.g. white pine blister rust). There are very few species that can be eradicated. “Management” of invasive species is often the best investment. Any efforts towards eradication may occur when an initial satellite occurrence of a species is identified. DATCP has the lead role for eradication when dealing with quarantined species.

FH.13 Comment: Does the term ‘invasive’ include both native and non native plants/animals and diseases?

Response: Although NR 40 defines invasive to mean those species that are non-native, non indigenous to Wisconsin, in the Strategic Direction the term invasive was intended to include both native and non-native species of insect or plant that is non-desirable or that competes with those species that are desired.

FH.14 Comment: Concern that the broad umbrella term of “Invasive Species” work might imply expanding the level of resources spent on some species where the war isn’t winnable.

Response: The intent of FLT is not for the Division’s goal to be “win the war” in regards to invasive species. Rather, the Division’s approach is to recognize and emphasize landowner objectives and invest resources toward “management” to reduce the negative impacts of invasive species – a more realistic goal. NR 40 stresses the need to invest more in the critical and more damaging invasive species. Efforts to implement and emphasize NR 40 are an important component of the Division’s Strategic Direction. Also see response to comment FH.12.

FH.15 Comment: Some reviewers expressed a lack of support for increasing investment in risk model development since they prefer to shift this investment toward more forest health field time. Also reviewers expressed the opinion that the Gypsy Moth risk map was not very accurate and was limited for field application. They prefer to instead invest in rapid development of control strategies for invasive plants.

Response: Risk mapping has not reduced available forest health staff field time. Risk modeling includes resource mapping efforts that help identify areas where mitigation should be targeted. It promotes a prioritization of where to spend limited resources. Development of control strategies is better suited for the research community. The Division can and does enter into partnerships with the federal government and academia on some of these efforts.

FH.16 Comment: What is the Division’s on-going commitment for monitoring invasive plants on state lands, especially State Forests?

Response: Collecting information regarding the presence of invasive species is now part of the forest reconnaissance done by field foresters on all public lands. The Forest Health program assists public lands managers with detection, monitoring and consultation.

FH.17 Comment: “Forest health” can be an ambiguous term – does it include broader biodiversity perspective of all organisms?

Response: Yes, it includes the entire functioning ecosystem.

FH.18 Comment: Perhaps the Division should invest more in research or partnering with external research experts to address knowledge of impacts of disturbances on biodiversity including invertebrates, soil organisms etc.

Response: The Forest Health program has and will continue to invest and partner with others in practical research aimed at answering questions where we need information rather quickly for management considerations. Studying impacts of biomass harvesting on invertebrates would be a recent example. The Division’s direct role in research will remain limited, but working with partners and research professionals to help focus their efforts on outcomes that will help inform our land management decisions and recommendations will continue.

Draft Intent Statement:

Maintain Program: The Division will continue to work in partnership with other DNR divisions, state agencies, and local municipalities to efficiently control damaging invasives. (FH-3)

Revised Intent Statement:

Maintain Program: The Division will continue to work in partnership with other DNR divisions, state agencies, and local municipalities to minimize the damage to Wisconsin’s forests from harmful invasives. (FH-3)

Reason for Change of Intent Statement:

FLT decided to make a slight change to better reflect the nature of invasive species management.

Comments and Responses:

FH.19 Comment: Overall there was strong agreement with the Division’s commitment to partner with other Divisions and external stakeholders.

Response: N/A

FH.20 Comment: The Division needs to manage the funds used to control invasive species. It needs to carefully prioritize and invest where the investment can be successful

Response: FLT agrees. Also see responses in FH.1 and FH.14.

Draft Intent Statement:

Maintain Program: The Division will provide education and outreach materials for, and implementation of, training related to BMP's, detection, monitoring and management of a broad number of invasive species. New partnerships will be sought to share information about landscape-level management for invasive species. Expanded use of the web as an outreach and education tool will be explored – particularly as it relates to sharing survey and management data. (FH-4)

Revised Intent Statement:

No change.

Comments and Responses:

FH.21 Comment: Overall reviewers agreed with Best Management Practices (BMP's) for invasives effort.

Response: N/A

FH.22 Comment: The Division should increase its investment in order to have a strong education and outreach effort.

Response: See response to FH.6.

FH.23 Comment: Is there a specific assessment and strategic plan for education and outreach?

Response: No, the intent expressed in the Strategic Direction is for the Division to develop a specific assessment and strategic plan for our overall role in education and outreach. Forest health focused education and outreach will be evaluated as part of this process.

FH.24 Comment: Social media isn't mentioned and this is a good tool to work into future direction.

Response: It is anticipated that the use of social media will be evaluated during the Division's assessment and strategic plan for education and outreach.

FH.25 Comment: Overall reviewers agreed with using risk assessments.

Response: N/A

NURSERIES

Draft Role Statement:

The Division's role in forest nurseries is to encourage afforestation and reforestation in Wisconsin by ensuring an adequate supply of high quality seedlings, of native species, is available at an economical price from public and private sources. The Division is proposing to maintain a capacity to produce stock at a level that, when combined with private sector capacity, meets projected demand for tree seedlings.

Revised Role Statement:

No significant change.

Comments and Responses:

N.1. Comment: A genetics program should not be separated from the nursery program.

Response: FLT believes that although genetics will continue to have an important connection to nurseries, it also plays an important role across the whole Division such as informing adaptation strategies or understanding the implications of varying silvicultural practices.

N.2. Comment: What will the future nursery program look like (i.e. size of program, containerized stock)?

Response: Issues involved with how the nursery program operates (level of production, number of nurseries, etc.) is being evaluated in the current work being done to develop the State Nursery Business Plan.

N.3. Comment: Monitoring and genetics language should be incorporated into the role statement, including tree improvement.

Response: There are many components of the State Nursery Program, including monitoring and genetics, as well as outreach, education and seed extraction for other agencies (U.S. Forest Service) to name a few. The intent was that by referring to the State Nursery in broad terms in the role statement, all components of the program were included. However, monitoring is discussed in intent statement N-2 and genetics in CP-1 of the Cross Program Section.

Draft Role Statement:

The paragraph explaining the current process to adjust the capacity of the nurseries to meet current demand was revised. Since it is directly related to intent statement N-1, it was moved to before the intent statement.

Proposed Change: State nursery facilities will scale production to meet seedling demand with an estimated production of 5 - 8 million seedlings annually. (N-1)

Revised Role Statement:

Program Change: State nursery facilities will scale production in relation to private sector capacity and changing seedling demand. (N-1)

Reason for Change of Role Statement:

The intent statement was changed to reflect that the level of production of state nurseries should take into consideration the amount of demand able to be met by private nurseries. The reference to a specific production number was deleted because distribution has varied over the last several years due to changing demand. The State Nursery Program has experienced demand ranging from 7 to 25 million seedlings in a given year.

Comments and Responses:

N.4. Comment (1): The Division should add containerized stock to its production.

Comment (2): The Division should add seed (for direct seeding) to its production

Comment (3): The Division should address natural regeneration techniques to our statement of intents for the nursery program.

Response: The State Nursery Business Plan, which was developed with input from internal and external stakeholders, is currently (April 2011) being developed and will inform a Department decision about what services the State Nursery Program should provide and where.

Draft Role Statement:

Maintain Program: The Division will increase the investment in a monitoring program that will monitor tree planting projects, identify problems, field test potential solutions, and disseminate lessons learned to internal and external customers to ensure high-quality stock in the future. (N-2)

Revised Role Statement:

Maintain Program: The Division will increase the investment in a monitoring program that will monitor forest regeneration, identify problems, field test potential solutions, and disseminate lessons learned to internal and external customers to ensure high-quality stock and successful planting survival in the future. (N-2)

Reason for Change of Role Statement:

FLT slightly changed the text to better reflect the intent that monitoring will be done on both artificial and natural regeneration.

Comments and Responses:

N.5. Comment: Why is the Division increasing investment in monitoring efforts since fewer trees are being planted? This seems to indicate there would be less to monitor.

Response: Monitoring has been done on a very limited basis – planting efforts are sampled in only one county per year. The need to monitor and assure adequate regeneration is just as important with 5 million trees planted as 20 million trees. The results and information gained by monitoring is beneficial to private entities as well. The intention of this role statement is to increase the monitoring program, meaning better statistical understanding of success overall.

N.6. Comment: Some reviewers doubted our reasons for decline in numbers of seedlings being planted statewide. One in particular stated that “enough past reforestation has taken place”, thus surmising that enough is planted already.

Response: Although significant planting has taken place in the last half century, the fact remains that there are still reforestation needs. The Statewide Forest Strategy identified the need for continued reforestation in order to address challenges our forests face in biological diversity, productive capacity and health and vitality. Additionally, there will continue to be reforestation needs due to regeneration after harvests, insect infestation, wildfire or storm event, as well as changes in land use and landowner objectives. As a result, FLT believes the Division has an important role in encouraging afforestation and reforestation by facilitating the availability of an adequate supply of high quality seedlings of native species.

PRIVATE FORESTRY

Draft Intent Statement:

The Division's role in private forestry is to facilitate the ability of private landowners to manage their forest land sustainably to provide an array of public benefits. The Division seeks to complement the work accomplished by private sector professionals by filling roles not conducive to private sector involvement. The Division is proposing to reduce emphasis on administering the state's forest tax program while increasing emphasis on reaching landowners who currently do not receive any professional assistance in managing their forest land.

Revised Role Statement:

No change.

Draft Intent Statement:

Proposed Change: The Division will develop and implement additional efficiencies in the administration of the Managed Forest Law (MFL) program. (PF-I)

Revised Intent Statement:

No change.

Comments and Responses:

PF.I. Comment: There was concern that increased efficiencies and streamlining within the MFL program will lower the standard for forest management required.

Response: FLT is not looking to reduce the quality of forest management; rather our intent is to increase the consistency and efficiency of the administration of the MFL program. We do believe there are opportunities within the MFL administration tools to improve efficiencies without impacting the quality of forest management (e.g., simplifying and streamlining the management plan by utilizing a standardized template for MFL plans). FLT is committed to clearly defining the range of acceptable sustainable management and determining how we will assure consistent application of the MFL program by DNR foresters and Certified Plan Writers with the associated accountability.

PF.2. Comment: What are specific examples of MFL efficiencies and streamlining that FLT believes could be realized or that are desired?

Response: FLT believes that MFL streamlining opportunities exist and will be integrated into how we implement the Strategic Direction. In order for that to occur, work is being done now to frame potential efficiencies within the policies and procedures of the MFL program. Some of these changes may require changes in statute or administrative rule, while others may be implemented through policy change and handbooks. Some of the MFL efficiencies and streamlining opportunities that are being evaluated for FLT consideration include:

- Changes in the MFL application referral process.
- Modification of the closed acreage allowances.
- Amending signature requirements.
- Amending the MFL program to eliminate lands with improvements except improvements as needed for land management.
- Revision of language to clarify the intent and procedure used by landowners, DNR, municipalities and partners.
- Increase the acreage share tax of MFL lands and eliminate the requirement of a yield tax.
- Allow for MFL withdrawal/transfer in any configuration as long as remaining lands meet the eligibility requirements.
- And others.

In addition to program and policy changes such as those listed above, the Division will be assessing how to increase efficiency in our oversight role with respect to landowners, cooperators and others working to implement MFL plans. The goal will be to reduce the time department staff spend reviewing the work of cooperators and assuring compliance with the program.

FLT feels that there is not one single efficiency that will streamline the administration of the MFL program; rather it will be a combination of policy, procedure and administrative changes that in total will improve overall efficiency.

PF.3. Comment: Developing quality and trust in our partners is a key need in order to find efficiencies in the MFL administration and compliance checking

Response: Developing efficiencies with our partners is a very practical approach toward program efficiencies. Simply stated, time is money. We want to spend quality time with our partners and develop that quality relationship to better understand real expectations of ourselves and those who also serve private landowners.

Draft Intent Statement:

Proposed Change: The Division will increase efforts to make full use of cooperating foresters for activities such as industrial transfers, in an effort to build the capacity of private sector partners. (PF-2)

Revised Intent Statement:

Program Change: The Division will increase efforts to make full use of cooperating foresters for activities such as industrial transfers, in an effort to build the capacity of private sector partners and focus DNR staff time on other activities. (PF-2)

Reason for Change of Intent Statement:

The intent statement was enhanced to better explain one of the benefits to building capacity in the private sector, namely to allow DNR the opportunity to work on other high priority work.

Comments and Responses:

PF.4. Comment: The Division should explore giving an incentive to those cooperators who prepare non-tax law stewardship plans or establish a sale for a landowner.

Response: The state Wisconsin Forest Landowner Grant Program (WFLGP) provides cost sharing for stewardship plan development through cooperators. WFLGP can also be used for a variety of non-commercial land management practices.

PF.5. Comment: The comments offered seemed to indicate there was not a clear understanding of what is meant by landscape scale and there was concern that there would be infringement of private property rights.

Response: FLT responded to the concern regarding property rights by changing the text to, “use of voluntary landscape scale management programs”. The vision is that a geographic area may be targeted for landscape scale management because it is a high priority for a certain type of management such as for a specific forest cover, wildlife, or it is at threat from issues like fragmentation. An example of this is occurring in the Driftless Area, which has unique ecological properties and increasing population pressures. Landowners can benefit from landscape scale management by sharing information on land management opportunities as well as joining together to benefit from the economies of scale in implementing desired management activities. Affected landowners would voluntarily decide whether or not they wanted to participate in a landscape level planning and/or management initiative.

PF.6. Comment: What is an industrial transfer, how is it done now and what is the change?

Response: Industrial transfers are generally defined as when a large MFL account (property greater than 1000 acres located in more than one county with the services of a professional forester and no site specific management plan) sells only a portion of their ownership to a new landowner. The new landowner, who no longer meets the criteria of a large MFL account, must develop a site specific management plan for those lands. Under this change, new landowners will utilize a private cooperating forester to develop the management plan ensuring that the new entry meets the eligibility requirements of the law (for example, at least 80% of the entry is “productive” and can produce wood fiber > 20 cubic feet per acre per year).

Draft Intent Statement:

The text introducing and explaining intent statement PF-3 was modified to better reflect the use, or the lack thereof, of professional assistance. Also, text was added to better communicate that landscape scale management is voluntary and that due to limited resources it is not the intent of FLT to establish landscape scale management programs in all areas of the state during the next five years.

Proposed Change: The Division will increase investment in efforts to reach the large percentage of private forest landowners who receive no professional assistance in caring for their land. (PF-3)

Revised Intent Statement:

Proposed Change: The Division will increase investment in efforts to reach the large percentage of private forest landowners who receive no professional assistance in caring for their land. Different techniques to reach these landowners will be tried and certain areas or groups will be focused on. (PF-3)

Reason for Change of Intent Statement:

The intent statement was changed to reflect that it is not FLT’s intent that a “one size fits all” effort be implemented statewide, rather that different techniques will be tried in focused areas or towards specific groups.

Comments and Responses:

PF.7. Comment: There was a mixture of support and opposition to the proposal to increase efforts to reach private landowners who receive no professional assistance or are not in the MFL program. Whereas some expressed the importance of reaching these landowners, others expressed concerns that the large turnover of ownership and increased parcelization makes this a poor investment.

Response: FLT affirms its intent to increase investment in efforts to reach private landowners who receive no professional assistance. FLT understands the difficulty in reaching new landowners. There is no magic bullet and it needs to be done in cooperation with others in the forest community. Therefore, one key component of this work will be to clearly define our role in reaching and informing private forest landowners. FLT recognizes that monitoring the effectiveness of these initiatives is important and within the next two years we are committed to investing resources to assess our role in outreach and education.

PF.8. Comment: DNR foresters should not provide service to properties that are less than 10 acres in size.

Response: The focus of DNR forestry is on properties greater than 10 acres and FLT is not proposing this change.

Draft Intent Statement:

<p>Proposed Change: The Division is proposing an increased investment in programs that utilize conservation easements to increase and secure private forested lands. (PF-4)</p>
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Revised Intent Statement:

No change.

Comments and Responses:

PF.9. Comment: Generally easements are considered as a good tool to reduce forest parcelization, conversion and development and effectively use limited funds.

Response: Forest easements typically include that sustainable forestry is a requirement of the easements and that lands be open for public recreation. For the most part, these easements require that the private land remains in MFL or be managed in an equivalent manner. DNR's role is to then ensure that the requirements of MFL are maintained just like all other private lands entered in the program. These easements are in perpetuity.

PF.10. Comment: A few respondents suggest that easements are the role of land trusts and the Division of Forestry ought to focus on MFL or on state properties.

Response: See response in PF.9.

Draft Intent Statement:

Proposed Change: The Division will maintain the level of investment in financial incentives to landowners but focus these more on landowners who currently do not receive professional assistance, in lieu of those already under the MFL. (PF-5)

Revised Intent Statement:

Program Change: The Division will maintain the level of investment in financial incentives to landowners but focus these more on landowners requesting assistance with management practices and those who currently do not receive professional assistance, in lieu of those already enrolled in MFL. (PF-5)

Reason for Change of Intent Statement:

FLT modified the intent to clarify that the emphasis of cost sharing should be for practices over plans and for non MFL over MFL.

Comments and Responses:

PF.11. Comment: The comments regarding cost sharing were wide ranging including that:

- MFL landowners should not get cost sharing including non mandatory practices.
- MFL landowners should get cost sharing only for non mandatory practices.
- Cost sharing should be used to pay for management plans for entry into MFL.
- Cost sharing should be used to pay for practices on non MFL lands.

Response: While management plans are one tool used to encourage landowners to invest in sustainably managing their land, they are not always feasible or the preferred option for all forest landowners. The Division will shift a portion of our workload toward helping landowners who are interested in implementing sustainable forestry practices, whether or not they have a plan directing the management of their land. FLT modified its intent to clarify that emphasis of awarding cost sharing funds should be prioritized for practices over plans and for non MFL over MFL.

PF.12. Comment: Avoid the use of state and federal cost share funds for the very same on-the-ground practice. Instead only allow cost sharing from one public agency for any one practice.

Response: In order to best utilize limited funds, FLT concurs that WFLGP should not be used if the practice can be cost shared by federal funds.

STATE LANDS

In response to comment S.1 below, the “Challenges and Opportunities” section was modified to better explain how forest ecosystems have changed over time.

Draft Role Statement:

The Division’s role in managing state lands is to ensure that state-owned forested lands are providing the economic, ecological and social benefits set out in property master plans. The Division is proposing to maintain its capacity to sustainably manage state-owned forested lands, and enhance our ability to improve recreational opportunities and visitor safety on designated State Forests.

Revised Role Statement:

The Division’s role in managing state lands is to ensure that state-owned forested lands are balancing the economic, ecological and social benefits derived from forests as set out in property master plans. The Division will maintain its capacity to sustainably manage state-owned forested lands, and enhance our ability to improve recreational opportunities and visitor safety on designated State Forests.

Reason for Change of Role Statement:

Slight wording changes which did not change the role of the Division in State Lands.

Comments and Responses:

S.1 Comment: Managing under represented forest types was a strategy in the Statewide Forest Strategy, but is only briefly mentioned in the Strategic Direction. Suggest a statement that the Division encourages the development of uncommon forest attributes.

Response: FLT agrees that managing under represented forest types is a role of the Division and how we do so is discussed in detail in property management plans. Given this and the level of detail in a Strategic Direction, FLT feels more specificity is not needed.

S.2 Comment: Concern was expressed that the statement, “Forest ecosystems are always in a state of change”, could be misleading, if not explained further.

Response: Text was added to clarify that when change happens rapidly it can have greater environmental impacts.

Draft Intent Statement:

Maintain Program: The Division will remain committed to current levels of sustainable forest management on all state lands as identified in property master plans. The Division will continue to meet allowable harvest goals as determined through the master planning process on all state lands. The Division will also continue to work on reducing the current backlog of forest management practices. (S-1)

Revised Intent Statement:

No significant change.

Comments and Responses:

S.3 Comment: There was overall support for the need to meet the allowable harvest goals on all state lands.

Response: N/A

S.4 Comment: As a general comment, some clarification is still needed in the Strategic Direction regarding “allowable” harvests on state lands and how the data are used and interpreted.

Response: The level of detail needed to explain how the allowable harvest is determined is not appropriate for a Strategic Direction and is, therefore, outlined here. The allowable harvest is the number of acres that can be harvested each year, on a sustained basis, without depleting the resource over time. It is calculated based on inventoried forest data collected by foresters in combination with long range planning (e.g. Master Planning) considerations. A property’s ecological, economic, and societal constraints are considered in this determination. The forester uses this information to determine a predicted year of harvest for each stand of trees. The combination of these stands, and their associated treatments, represents the number of acres to be evaluated for harvest in a particular year. The annual allowable timber harvest is a long term monitoring figure. Yearly fluctuations are common due to changing conditions created by storms, insect & disease infestations, fires, or backlogged workload. The annual long term harvest acreage goal in the Wisconsin Forest Inventory & Reporting System (WisFIRS) identifies the annual allowable timber harvest for each property.

Draft Intent Statement:

Proposed Change: The Division will increase the number of lump-sum timber sales. Where cost effective, the Division will contract with private cooperating consulting foresters to establish a portion of timber sales in order to maximize DNR’s ability to accomplish workload priorities across the Division. (S-2)

Revised Intent Statement:

Intent statement was **deleted**.

Reason for Change of Intent Statement:

Intent statement S-2 (lump sum sales and contracting) was deleted. Instead the intent of FLT to increase use of lump sum sales and contracting as tools to increase the Division's ability in meeting allowable harvest goals was captured in the paragraph leading into intent statement S-1.

FLT realized that the identification of contracting and use of lump sum sales was not appropriate for an intent statement since both are simply tools we can use to accomplish our work. In other words, they are operational tools, not strategies. FLT continues to believe that they both offer opportunities to increase our ability to achieve our allowable harvest goals. However, FLT also recognizes that the use of lump sum or contracting will not be cost effective in every case. The Division is in the process of completing a study evaluating whether, and under what circumstances, using private cooperating consulting foresters to establish timber sales is cost effective. The results of that study will inform how we proceed in the future. With respect to lump sum sales, FLT is compelled by the experiences of other public and private land managers in Wisconsin and elsewhere that lump sum sales are a tool that, in the right place, is cost-effective. Therefore, the Division will increase the number of lump-sum timber sales and establish criteria for their use. Collectively, these tools will be used to maximize DNR's ability to accomplish workload priorities across the Division. The majority of this work will continue to be done by DNR staff.

Comments and Responses:

S.5 Comment: Opinions regarding increasing the use of lump sum sales was about evenly split between support and opposition. Many of those supporting the use of lump sum sales were for allowing their use in very limited or in highly constrained circumstances. Those opposed to the use of lump sum sales doubted the cost effectiveness or believed the state would lose revenue due to the possible inaccurate timber cruises. There was also a concern that many loggers would not bid on lump sum sales due to the potential increase in economic risk. The vast majority of external comments strongly supported the increased use of lump sum timber sales.

Response: The FLT affirms its intent to increase use of lump sum timber sales. FLT recognizes that not every sale is ideal for lump sum and intends to establish criteria for their use. FLT feels that the concerns expressed regarding possible lost revenue to the State from lump sum sales is not realistic in a competitive market since most loggers are familiar with lumps sum sales and the competition in a sealed bid system will set the fair market value. Other large landowners in Wisconsin and nationally have successfully utilized lump sum sales for many years.

S.6 Comment: Contracting should not be used to set up timber sales on state lands. Some of the reasons given were:

- It is not cost effective.
- It takes away work DNR should be doing.
- The Division should focus existing staff duties better (better use of forest technicians and forester rangers in the non fire season).
- Several opposed to contracting supported the use of LTE's or a private forester on a retainer to complete specific services as a good way to increase the time available for timber sales.

Response: The FLT believes that it is important to have a range of tools available for accomplishing our priority work, including meeting the allowable cut on state lands as determined by property master plans. FLT's intent is to emphasize the use of additional tools such as contracting in those circumstances where it is most cost-effective as a means of increasing the overall resources available to accomplish the Division's priority workload. An on-going evaluation of contracting will be used to help inform under what circumstances contracting makes sense as a tool to supplement the work done by state employees.

Draft Intent Statement:

The paragraph leading into this intent statement was revised to better explain how reforestation on state lands is currently funded and why a need exists to find an alternate funding source. See comment S.8

<p>Proposed Change: The Division will increase the amount of funds for reforestation on all state lands, ensuring adequate resources to meet identified reforestation needs. (S-3)</p>

Revised Intent Statement:

No change.

Comments and Responses:

S.7 Comment: There was strong support for using a percentage of timber sale revenue for reforestation, but some want to expand the concept to cover timber stand improvement and general treatment/control of invasive species.

Response: This concept will be advanced as a statutory change proposal.

S.8 Comment: The rationale for using a percentage of timber sale revenue for reforestation is unclear.

Response: To date the Division has heavily relied on gift funding for reforestation on state forests which is declining rapidly. As a result an alternate funding source to cover the costs of reforestation is needed. This change, as proposed, would fund reforestation, afforestation, site preparation and release of both natural regeneration and planted stands.

Draft Intent Statement:

Proposed Change: The Division will implement recreation priorities articulated in property master plans and increase the level of investment in the state forest recreation program to enhance unique niche recreation activities such as remote camping and trails, and serve high demand recreation facilities while continuing to provide for visitor safety. (S-4)

Revised Intent Statement:

Program Change: The Division will implement recreation priorities on state forests as articulated in property master plans and increase the level of investment in the state forest recreation program to enhance unique niche recreation activities such as remote camping and trails, and serve high demand recreation facilities while continuing to provide for visitor safety. (S-3)

Reason for Change of Intent Statement:

Wording was added to clarify that this intent applies to state forests only and not other state lands.

Comments and Responses:

S.9 Comment: Overall reviewers supported increasing the investment in the state forest recreation program.

Response: N/A

S.10 Comment: Clarify that recreation management follows the property’s master plan.

Response: The text of the intent statement was modified to do this.

S.11 Comment: The following should be added 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.”

Response: FLT agrees that those values should be protected, but felt they are clearly identified in the individual property master plans.

S.12 Comment: Some reviewers expressed concern over the need to avoid timber management/recreational conflicts whenever possible.

Response: FLT agrees that guidelines to minimize user conflicts should be implemented, as needed, on specific harvests.

S.13 Comment: Some reviewers suggested the Division utilize passive management areas for new recreation developments.

Response: This is a master plan specific topic and should not be generically applied to all recreation areas.

Draft Intent Statement:

<p>Proposed Change: The Division will increase the investment in land survey and workload associated with property boundary issues such as trespasses and newly acquired land. Acquisition efforts will continue and use criteria aligned with the recently approved Stewardship Land Acquisition Strategy. (S-5)</p>
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Revised Intent Statement:

No change.

Comments and Responses:

S.14 Comment: Overall DNR staff strongly supported increasing the Division's investment in land survey work and work associated with property boundary issues.

Response: N/A

S.15 Comment: There were a few comments expressing concern regarding the impact on local tax revenue as a result of the Department buying land.

Response: The Department of Natural Resources makes an annual payment in lieu of real estate taxes to replace property taxes that would have been paid if the property had remained in private ownership. The payment is made to the local taxing authority where the property is located. Because DNR pays a fair share of aid on all lands purchased since January 1, 1992, there is no loss of property tax revenue in the taxation district due to DNR ownership. In fact, because the purchase price is often higher than equalized assessed value, the DNR payment is often greater. *[The Division understands that this payment system is currently under debate as part of the 2011-2013 budget bill.]*

Draft Intent Statement:

Proposed Change: The Division will decrease overall investment in planning from current levels due to the pending completion of state forest master plan revisions. Focus will be shifted to assisting other DNR programs with the planning needs for other state lands. (S-6)

Revised Intent Statement:

No change.

Comments and Responses:

S.16 Comment: Overall the intent to decrease investment in planning had strong support from DNR staff and less support from our external partners.

Response: The decreased planning investment is relatively small with a redirection of more resources to help increase planning efforts on state lands for the next several years. Revision of existing State Forest master plans will again increase resource needs beginning in 2014.

URBAN FORESTS

Draft Role Statement:

The Division's role in urban forestry is that of a convener to bring interests together and build partnerships to advance urban forestry as practiced by local communities, private sector specialists, and community organizations. The Division is proposing to shift emphasis from a public 'street tree' model to an integrated 'community canopy' model that better reflects how it can maximize the public benefits from all trees and forests in our communities.

Revised Role Statement:

The Division's role in urban forestry is that of a facilitator to bring interests together and build partnerships to advance urban forestry as practiced by local communities, private sector specialists, and community organizations. The Division will shift emphasis from a public 'street tree' model to an integrated 'community canopy' model that better reflects how it can maximize the public benefits from all trees and forests in our communities. The Division helps establish and advocate for best management practices in coordination with partners.

Reason for Change of Role Statement:

FLT changed the wording to better reflect the Division's role as facilitators as compared to collaborators. Additional text was added to recognize our role in the development and advocating of best management practices.

Comments and Responses:

U.1 Comment: Overall, external partners supported the Division shifting emphasis to an integrated 'community canopy' model.

Response: N/A

U.2 Comment: DNR does not have a role in Urban Forestry or should decrease its investment.

Response: FLT affirms that the Division of Forestry does have a role in urban forestry and is increasing the level of investment in this program. Just as our rural forests do, Wisconsin's urban forests provide a wide range of ecological, economic and social benefits to a large segment of the state's residents. The Division's role is partner focused. There are actions that the Division won't take anymore, but there are also incredible opportunities to help even more people manage and benefit from their urban forest through our work. Current examples of where the Division has supported or facilitated partnerships are:

- First Downs for Trees – a partnership that engaged the Green Bay Packers, Wisconsin Public Service Corporation, the Oneida Nation and 21 Brown County communities to plant trees and promote tree planting.
- Taking Root Campaign of the Oshkosh Area Community Foundation – a private-public funding source for tree planting in the Oshkosh Area.

- Green Tier Legacy Communities – a recently chartered partnership where communities pledge to take actions and share information to achieve superior environmental performance.

U.3 Comment: The terminology in the Urban Forestry section is unclear and undefined.

Response: The following terms and phrases were noted as those needing better definition:

- “shift in emphasis” (see UF role statement, also throughout document): This means moving towards the new direction. It does not mean moving from a regional based effort to a central office based effort nor does it mean completely changing everything all at once. The degree of shift will be dependent on the needs, opportunities, and resources of the areas being served.
- “Public ‘street tree’ model” (see UF role statement): This model focuses on trees on public property such as public street trees, park trees and trees on other municipal property. It is a subset of a community's urban forest and generally excludes private property trees.
- “Integrated ‘community canopy’ model” (see first UF role statement): An integrated community canopy model considers all trees within a community – street, yard, park, and so on.
- “Investment” (see UF-4 and UF-5): This term can mean staff, time and financial resources. Until the Division makes decisions on how to implement the Strategic Direction, it is unknown exactly how, when, or where the investment will be made or changed.

U.4 Comment: Describe more of the desired outcomes for each of the intent statements in order to clarify the benefit.

Response: FLT agrees with this suggestion and the text was modified to do so.

U.5 Comment: Define/replace the word “convener”.

Response: FLT recognized that convener was not the appropriate term and replaced it with facilitator.

U.6 Comment: There is no acknowledgment in the document of the past successes of the current model, what has changed, and how have those changes brought us to the point of needing to change our strategy...i.e. “Why?”

Response: FLT recognizes that the Division’s urban forestry has been very successful. Many of the Division's long-standing programs have also been successful and yet have evolved significantly over time, reflecting changing conditions, understanding, capacity and needs. Urban Forestry is a maturing program and the changes in its strategic direction do not imply the current model has failed; rather, its success has created a demand that must be met with new methods given limited resources. We are choosing to do this by strengthening and maintaining partnerships.

U.7 Comment: Lack of species diversity and canopy cover are only the challenges for the resource itself. The challenges for the practice of urban forestry, which we are all responsible for, are the lack of technical expertise, the capacity to manage the resource, and the public and private support to do so.

Response: The challenges of the urban forest are met with actions in urban forestry. As a result, no changes were made in the Challenges and Opportunities section as that focuses on the forest resource, but revisions were made throughout the document to emphasize the role the Division will play to facilitate building capacity to manage the urban forests of the state.

Draft Intent Statement:

The paragraph leading into the intent statement was revised to provide more explanation of a ‘multi-community’ approach and why managing at a “community canopy” level is beneficial as compared to “street tree” level.

Proposed Change: The Division will focus assistance at the regional or metropolitan scale and will do less individualized local program delivery. (UF-1)

Revised Intent Statement:

Program Change: The Division will focus assistance at a multi-community scale and will do less individualized local program delivery. (UF-1)

Reason for Change of Intent Statement:

FLT realized that “Metropolitan scale” is a term that, in this context, is not well understood. As a result the language was changed to “multi-community scale”.

Comments and Responses:

U.8 Comment: Small communities should still be serviced.

Response: The intent is not to abandon small communities; however, the manner in which they receive services will change. Currently DNR coordinators provide direct assistance, often one on one, to communities. There will be differences in how the strategies are implemented depending on region, resources, needs and opportunities. This is a five year Strategic Direction and the Division recognizes that changes will not happen overnight; they will evolve over time. Some examples of larger scale assistance models we are using or could use are:

- Regional urban forestry networking groups that gather community peers together to share information and address common issues. With one effort, many communities are affected.
- Work at the state level to introduce legislation that benefits urban forestry, such as was done to increase DNR's ability to respond to community urban forestry needs after a catastrophic storm event. This resulted in our state Urban Forest Catastrophic Storm Grant program that helps all communities during a crisis.
- Greening Milwaukee, a Milwaukee-based nonprofit, and The Center for Resilient Cities, a Madison-based nonprofit, work with neighborhoods and local governments to get trees planted and cared for on private property and green space developed and managed in their metro areas. DNR not only assists these efforts, but can work to spread these models to other parts of the state.

U.9 Comment: What are regional and metropolitan areas and why should they benefit more than small communities?

Response: The term "regional and metropolitan" was changed to "multi-community" in the text to avoid misunderstanding. In addition "multi-community" is further explained in the text, "depending on the issue or program, could involve communities across several counties, a group of small communities, metropolitan areas, or statewide initiatives." So, it should be clear that small communities are included in this concept. However, it should also be clear that with the Division's limited resources, if given a choice between providing service to impact multiple small communities or providing service to a single small community, the Division will favor the multiple community approach and also seek to create those opportunities. This approach can draw on the capacity and resources of groups of communities and can affect a greater proportion of the urban forest and benefit a greater number of citizens. Examples of successful multi-community initiatives include:

- Waupaca County received one urban forestry grant to develop tree boards in all six of the small communities in the county.

- In two instances, communities in Jefferson County and communities in the Fox Valley each partnered together for one grant to contract for urban forestry services (inventory and Arbor Master training) for all communities.
- The city of Milwaukee tried to enlist other area communities to do a metro region hyper-spectral canopy analysis to identify ash trees. This would have saved considerable contract and administrative costs due to economy of scale compared to individual community fly-overs. Unfortunately only one community signed on to this initiative and it was a missed opportunity for all communities in the Milwaukee area to get valuable resource information. DNR could facilitate these types of partnerships in the future.

Draft Intent Statement:

Proposed Change: The Division will increase the focus on developing broad scale partnerships and funding mechanisms to enable communities, foundations, non-profits and professional organizations to add value to urban forests. (UF-2)

Revised Intent Statement:

Program Change: The Division will increase the focus on developing broad scale partnerships and funding methods to enable communities, regional planning commissions, tribes, foundations, non-profits and professional organizations to add value to urban forests. (UF-2)

Reason for Change of Intent Statement:

FLT decided to slightly revise the intent statement to provide better clarity and to recognize the tribes and regional planning commissions as partners in urban forestry.

Comments and Responses:

U.10 Comment: What does “funding mechanism” mean?

Response: The term was changed to “funding method”.

U.11 Comment: It may be unrealistic to assume opportunities for “building partnerships” exist.

Response: As noted in U.3 above, in the "shift of emphasis" definition, partnership development will be dependent on the needs, opportunities, and resources of the areas being served. However, FLT also recognizes that innovation is often incentive-driven and occurs in unexpected places. The program will work to provide opportunities that encourage partnerships and innovation that may be out there but untapped.

Draft Intent Statement:

Text was added to the paragraph leading into this intent statement in order to clarify that small communities will not be excluded from applying for grants.

Maintain Program: The Division will maintain the urban forestry grant program at current levels to enable the communities, primarily through metropolitan scale partnerships, to leverage local resources. (UF-3)

Revised Intent Statement:

Maintain Program: The Division will maintain the urban forestry grant program at current levels and encourage multi-community partnerships, to leverage local resources. (UF-3)

Reason for Change of Intent Statement:

The intent statement and the explanatory text preceding it were revised to capture FLT's desire to engage communities in a more efficient manner in order to reduce administration and increase outcomes.

Comments and Responses:

U.12 Comment: The Tree City USA (TCUSA) program has minimal benefits.

Response: FLT disagrees. The Tree City USA program is an efficient outreach tool to raise public official awareness of the value of urban forestry and its local support. It is a partner-based program with national visibility and established criteria. Funding and support comes from the Arbor Day Foundation, the USDA Forest Service and the National Association of State Foresters. TCUSA regularly generates local, regional and state media and public attention that could not be achieved without significant additional state investment. However, the administration of the program could be streamlined and the Arbor Day Foundation is currently working with the DNR to accomplish this. In addition, since TCUSA is an outreach effort, it will be evaluated as part of the Division's upcoming education and outreach assessment.

Draft Intent Statement:

Proposed Change: The Division will increase investment to help create and support a statewide inventory and assessment of the urban forests of Wisconsin to provide best available data for program planning and prioritization of efforts. (UF-4)

Revised Intent Statement:

No change.

Comments and Responses:

U.13 Comment: Support was expressed by reviewers for increasing investment to create a statewide inventory and assessment of Wisconsin's urban forests.

Response: N/A

Draft Intent Statement:

Further clarity was provided by revising the text leading into the intent statement to reflect FLT's intent in regards to education and outreach for urban forestry is to decrease investment by program staff and the resulting importance of partnerships.

<p>Proposed Change: The Division will decrease investment in outreach and education initiatives. The Division will focus on partnerships that can provide services and tools to local governments and organizations working in small communities and those without active urban forest management. (UF-5)</p>
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Revised Intent Statement:

No change.

Comments and Responses:

- U.14 Comment:** It is unclear what role the Urban Forestry program will have in education and outreach.
- U.15 Response:** Investment in the current Urban Forestry program's education and outreach initiatives will be decreased. Some savings will come from our decreased role in Arbor Day activities and others will be identified as part of the work of determining how we will implement the Strategic Direction. The Urban Forestry program's education and outreach focus may change as a result of the Division's upcoming education and outreach assessment and strategic plan. The Division will work with partners to determine our best role.

UTILIZATION & MARKETING

Draft Role Statement:

The Division's role in marketing & utilization of forest products is to facilitate the ability of the private sector to use the state's wood resource in an efficient, effective and sustainable manner, maximizing wood's contribution to Wisconsin's economy. The Division is proposing to increase its capacity to provide assistance to wood-producing and wood-using companies around the state and maintain its capacity to assess the condition of the state's forest resources.

Revised Role Statement:

No change.

Comments and Responses:

UM.1 Comment: Strong support was expressed for increasing the Division's capacity to provide assistance to wood-producing and wood-using companies around the state.

Response: N/A

UM.2 Comment: The comments revealed that the word 'marketing' in this context was misinterpreted.

Response: Text was added to the Strategic Direction to help alleviate this confusion. In the context of the U&M program, marketing does not mean work that involves advertising or branding. Rather it refers to work efforts that maintain (e.g. pulp, saw timber, furniture) or develop (e.g. bioenergy, urban biomass) a market sector through data analysis and support services such as sub-state level forest inventory, identification of market opportunities, site location and business plan analysis, manufacturing process improvement, technology transfer, international trade missions and training.

Draft Intent Statement:

Proposed Change: The Division will increase investment in utilization and marketing expertise to assist existing and new forest industries to retain markets and develop new markets. (UM-1)

Revised Intent Statement:

No change.

Comments and Responses:

UM.3 Comment: Majority of respondents support an increased investment in U&M

Response: N/A

Draft Intent Statement:

Maintain Program: The Division will continue to invest in the forest inventory and analysis (FIA) at the double intensity level, ensuring its continued ability to use the information at a sub-state scale. (UM-2)

Revised Intent Statement:

No change.

Comments and Responses:

UM.4 Comment: Majority of respondents support maintaining our investment in FIA.

Response: N/A

CROSS-PROGRAM ACTIVITIES

Draft Intent Statement:

Proposed Change: The Division will maintain current investments in silviculture/forest ecology and forest hydrology. An increased investment will be made in genetics and forest economics, whereas a shift will occur in endangered resources management, reflecting the maturing of a federal Habitat Conservation Plan. (CP-1)

Revised Intent Statement:

Program Change: The Division will maintain current investments in silviculture/forest ecology and forest hydrology. An increased investment will be made in genetics and forest economics, whereas a reduction will occur in the Karner blue butterfly Habitat Conservation Plan implementation, reflecting its maturation. (CP-1)

Reason for Change of Intent Statement:

FLT slightly changed the role statement to clarify that the Division will only be making a shift in regards to the Habitat Conservation Plan (HCP) and not in endangered resource management as a whole.

Comments and Responses:

CP.1 Comment: Some reviewers expressed concern that our statement about shifting resources from endangered species raises questions about our commitment to endangered or threatened species in general.

Response: It was not FLT's intent to change our commitment to protecting and managing endangered and threatened species. As a result the intent was changed to clarify that the reduction is only in regard to the Habitat Conservation Plan for the Karner blue butterfly (see CP.2).

CP.2 Comment: Please clarify FLT's intention with regard to reduction in the Kbb Habitat Conservation Plan.

Response: We remain committed to the successful implementation of the Karner blue butterfly Habitat Conservation Plan through our support of the Kbb HCP partnership. Because that partnership has matured and the federal Incidental Take permit has been renewed for another ten years, we feel we can afford to shift some of the funding previously devoted to building this partnership to other pressing priorities.

CP.3 Comment: Why isn't climate change specifically mentioned?

Response: Climate change was part of the Statewide Forest Assessment and Strategy and many of the intent statements do recognize the need to increase the resilience and adaptability of our forests due to the effects of changing climatic

conditions. For example, contained within the increased investment in genetics is the intent to expand into testing seedlings for adaptation and gene conservation.

CP.4 Comment: What is FLT's intention with regard to the expanded role for genetics versus the previous focus on tree improvement and nurseries?

Response: The expanded role for genetics will include a continued focus on tree improvement and nurseries, but also include focus on related issues such as species range and other adaptations to changing conditions. Priorities for genetics services will be determined on a periodic basis, taking into account the full range of issues that the Division needs to address.

Draft Intent Statement:

Proposed Change: The Division will modestly increase funding to support informed decision-making. The Division will continue to work with internal and external partners to assess priorities for research on ecological, economic and social aspects of forestry. (CP-2)

Revised Intent Statement:

No significant change.

Comments and Responses:

CP.5 Comment: Generally, reviewers were supportive of our increased investment in research.

Response: N/A

CP.6 Comment: There was a mixture of support for research on deer impacts to the forest.

Response: The Division will use a process that includes field and partner input to prioritize our research investment.

Draft Intent Statement:

Proposed Change: The Division will significantly increase its investment in IT and GIS to support all Division programs. (CP-3)

Revised Intent Statement:

No change.

Comments and Responses:

CP.7 Comment: Overall, there was support for the proposed investment in IT/GIS.

Response: N/A

CP.8 Comment: Why does IT (information technology) need to be increased?

Response: Many Division IT systems mimic the business workflow that employees are currently performing. The intent is to automate, standardize and be able to more accurately plan work and report accomplishments. Currently, the Division of Forestry's IT project development portfolio contains 20+ projects addressing many programs including invasive species, forest protection, emergency management, nurseries, urban forestry, and training. These cannot be developed due to a shortage of staff and funding to develop and maintain these applications. It is very costly to hire and oversee contractors for this work, so existing resources do not go very far. It is not feasible to use commercially available products for our applications because of the complexity and specialized needs of the work involved, although existing applications are sometimes incorporated as a component of a larger application. As additional applications are developed to meet business practices and customer demands, the need for IT staff to help maintain and support these investments will continue to grow.

Draft Intent Statement:

Assess Program: Within the next two years, the Division will invest resources to assess the Division's role in outreach and education on the protection and sustainable management of Wisconsin's forests. A specific strategic direction, planned with the input of staff and partners, will guide the Division's future outreach and education work and investments. (CP-4)

Revised Intent Statement:

No change.

Comments and Responses:

CP.9 Comment: Generally, there was support for developing an outreach and education strategic plan. Several respondents (internal & external) expressed a strong wish to be involved and to collaborate on the resulting programming.

Response: N/A

CP.10 Comment: Why is the development of an outreach & education strategic plan a good use of resources?

Response: The Division has invested a great deal of funding and staff time in education and outreach over the years, with relatively little coordination among programs or topics. It is not always clear who the audience is, what behavior the message is intended to influence or change, and how success can be measured. The Division and our partners sometimes conduct programming that is somewhat redundant. By investing in a strategic plan for outreach and education, which will include input from Division personnel and partners, we can clearly establish our audiences, messages, and measures for these investments, which will mean a more focused use of resources over the long term.

CP.11 Comment: Why wasn't the development of an outreach & education strategic plan included in work that went into this Strategic Direction? And why will it take two years to complete?

Response: The need for an outreach & education strategic plan was identified during the development of the Strategic Direction. Because outreach and education crosses all programs and many diverse partners, it could not be undertaken while the Strategic Direction was being completed. With so many programs and partners wanting to be involved in this planning process, we estimate it will take 1-2 years to complete.

CP.12 Comment: Will the outreach & education strategic plan address the role of field staff and partners such as basin educators?

Response: Yes

CP.13 Comment: Will staff and partners be involved in the development of the outreach & education strategic plan?

Response: Yes

Draft Intent Statement:

Maintain Program: The Division will continue our commitment to hiring quality employees, ensuring we have a trained and professional workforce, and supporting leadership development and succession planning. (CP-5)

Revised Intent Statement:

No change.

Comments and Responses:

CP.14 Comment: Generally, there was support for the Division’s continued commitment to employees.

Response: N/A

CP.15 Comment: Please clarify what is meant by “trained workforce”.

Response: A “trained workforce” includes continuing education and professional development for all our employees, current and newly hired.

Draft Intent Statement:

Proposed Change: The Division will increase investment in policy analysis to address the acceleration of forestry issues that have a significant impact across program areas and at both the state and federal level. (CP-6)

Revised Intent Statement:

No change.

Draft Intent Statement:

Maintain Program: The Division remains committed to its investment in third-party certification of state lands, county forests and the Managed Forest Law. (CP-7)

Revised Intent Statement:

No change.

Comments and Responses:

CP.16 Comment: Several reviewers called for the Division to add a certification program that would include non-MFL private lands.

Response: The Division is exploring opportunities to increase the amount of certified wood available to the marketplace by possibly partnering with industry in reaching out to non-MFL subscribed landowners. Current efforts include initial efforts to gauge landowner interest and development of promotional material for certification programs.

CP.17 Comment: Certification is not a good use of resources.

Response: FLT remains committed to certification based on input from industry and the Council on Forestry that certification is vitally important. We cannot afford to ignore how crucial certified raw materials are to our forestry-based businesses. At a time when many sectors of the industry have suffered flat or falling demand due to global supply changes, the call for certified products from our forests is experiencing steady upward growth. Forecasted demand for these products is expected to increase even more in the future.

The support the state has provided in the certification of public and private lands has been instrumental in maintaining the competitiveness of important parts of Wisconsin's forest industry. Wisconsin's paper industry's primary customer is the printing industry which demands high levels of certified content in their paper. Without the state's effort in encouraging and certifying forestlands it is likely we would have seen the closure of three large pulp mills as the printing companies would have sourced their raw material from other mills that are certified. These pressures are expected to continue for the paper and printing industries.

The certified supply of products also aids sawmills. Most of the major sawmills in Wisconsin are certified. A significant number of window, door, furniture and other value added wood product manufacturers in Wisconsin are also certified and as a result demand certified wood. This has provided the opportunity for these certified companies to garner market share in a very competitive market, keeping jobs in Wisconsin and helping manage our forests. The Forest Stewardship Council lists 237 certificate holders in Wisconsin.

All indications are that the demand for certified products will continue. Two indications of this are:

- In April 2011, the Walt Disney Company recently released their 2010 Corporate Citizenship report, which outlines the company's product footprint

policy, including requirements for 100 percent paper sourcing from sustainable sources. Paper must contain recycled content, be sourced from certified forests, or be of known source origin.

- Also in April 2011, the American Forest & Paper Association (AF&PA) has announced a set of sustainability goals for the forest products industry, dubbed "Better Practices, Better Planet 2020." The program lays out a number of goals to reach by 2020, including increasing the amount of fiber procured from certified forest lands.

Draft Intent Statement:

Proposed Change: The Division proposes to invest in energy audits of our facilities, following which facilities will be prioritized for project implementation. (CP-8)

Revised Intent Statement:

Program Change: The Division will invest in energy audits of our facilities and pursue energy efficiency in the design of new facilities. (CP-8)

Reason for Change of Intent Statement:

Based on comments, FLT changed the statement to clarify that their intent was also to pursue energy efficient design on new as well as existing facilities.

Comments and Responses:

CP.18 Comment: There was overall support for investing in energy audits and pursuing energy efficient facility designs.

Response: N/A

CP.19 Comment: Several reviewers suggested that we include: energy-efficient vehicles, discouraging staff from driving more than they need to “keep mileage up to keep the vehicle,” and an assessment of our inventory of buildings with the aim to consolidate operations.

Response: These suggestions will be considered when developing the implementation plan for the Strategic Direction.

Draft Intent Statement:

Maintain Program: The Division will maintain our current level of assistance to other DNR programs and continue to work on collaborative projects. (CP-9)

Revised Intent Statement:

No change.

Comments and Responses:

CP.20 Comment: There was overall support for maintaining our level of assistance to other DNR programs and work on collaborative projects.

Response: N/A

OTHER REVISIONS

Since the document has changed from a draft to a final version, some text was no longer appropriate and was deleted. An example is the text that explained how a person or organization could comment on the draft. Also, in refining the document some text was revised to improve readability and/or moved to a more appropriate location. This type of change occurs throughout the document, but does not change the overall content of the Strategic Direction.