

DIVISION OF FORESTRY STRATEGIC DIRECTION

COMMENTS ON DRAFT

The following are comments received on the Draft Strategic Direction that was released in December 2010. Each comment is categorized by who wrote it; either “Division of Forestry staff”, “DNR Forestry Specialist Teams”, “DNR staff (non-Forestry)”, and the fourth category - “public” - are those not associated with the DNR such as organizations, other agencies, and the private individuals.

The first section contains comments on the overall Division’s role, Strategic Direction, and investment trade-offs and then comments regarding specific programs start on page 22. Many reviewers commented on several sections of the document. When a part of a reviewer’s comments were moved to another section, it is noted with three periods (...).

OVERALL COMMENTS ON THE DIVISION’S ROLE & STRATEGIC DIRECTION

DNR STAFF COMMENTS

1. The cultural survey points out some strong correlations. It appears that the larger the number of people surveyed and the larger the geographic area surveyed the less color appeared in the circle charts. To me this is a direct correlation to weak communications and an overly large span of control that some of our leadership struggles with daily. A correction to this may be found in the incident command system where the lines of communication are kept strong by limiting the supervisor-subordinate span of control to a ratio of 1:5 and no more than 1:7. It has been found that a span of control larger than this leads to communication break downs, inefficiencies, and significant life safety implications. A solution to this may be to formerly adopt the lead worker concept in that specific forester seniors, forester-rangers and other carefully identified forestry staff are given the authority and responsibility to carryout day to day face to face supervisor duties. division to adequately and effectively handle the workload across the state.

...

Among all of the changes and tough economic issues we are dealing with there is some optimism in the air and I look forward to taking this process to the operational level with the hopes that the changes we make lead to positive results. However, many of our staff are stressed out because they are not sure where our division is going and are also struggling with burgeoning workloads related to vacancies. Hopefully, we will be able to provide them with more specifics soon and re-align our division to adequately and effectively handle the workload across the state.

Division of Forestry staff

2. Another thing was core values of the Division and “Quality” was listed and discussed heavily. I think it must be understood that in this department quality comes from the individual. In the northeast we have many quality employees and these employees are that way because they have a good work ethic and passion. The changes to many of the programs that come from Madison hope to stream line things but often reduce quality so the apparent message we get from Madison is that quality is not as important as getting the job done.

I don’t mean to use the term “Madison” in anyway to group people. I just use it to explain where field folks see decisions being made.

I do appreciate the recognition of regional differences in the strategic direction and the opportunity to comment. As phase 2 begins on how to implement these directions I hope to get the same opportunity.

Division of Forestry staff

3. Central Office is on a majorly different level than the rest of the state, but I do not believe that this is an issue that would prevent effective communication flow. Central Office is concerned and focused on policy dealings and (for the most part) the rest of the state is dealing with on-the-ground forestry. The breakdown I see with communications is on the Area Leaders part. Potentially some of this burden is connected with the Team Leader position, but I think that most of this concern resides with the Area Leader. This is a very critical link - they have (for lack of better words) one hand in overall management and the other in field forestry operations. So with that in mind, I clearly believe that true and effective communication flow from top to bottom and bottom to top rests within this position.

Division of Forestry staff

4. Yes, overall I do believe it is appropriate and if not the best - its is probably as good as it can get - in terms of using Division resources. I believe that the SD represents a continuation of 90%+ of exactly what we have been doing which has evolved over the years and as such represents our "niche" in my opinion. And the ~10% of new/changed direction is for the most part well laid out - and makes sense. I do however have a few problems/concerns with it overall.

One thing that I noticed is that if one generalized - any increases in FTEs all appear to be central office/bureau positions and reductions in field staff. I believe that the proposed changes are sensible and do better fit our "niche" -- but from an outside perspective it could add to the perspective of government bureaucracy with more people in Madison with less contact with public/partners.

Another general trend that I see in the SD and in my daily work life over the past 5 years is "privatizing" what we do. And while it can be easy to say that I have a bias towards state foresters doing the work (which I do have) - I believe it is often the most efficient and best way to sustainably manage WI forests. As a division the less tangible forest management that we provide to private landowners, to county partners and on our own state lands - the less relevant we become. That is to say as we do less - we are seen more as a regulator than a facilitator/partner. And as we shift costs for assistance we used to provide to private landowners, county forests, municipalities, school districts with school forests, and other divisions with land management responsibilities we are creating a disincentive to sustainable forest management. Even if we provide the same amount of \$ to do the work - there is often a perceived and real set of hurdles to get that money to people to do the work and the partnerships are eroded.

My other major concern is that I do believe that this SD will at some point be used under a reduced budget scenario that will ultimately lead to more significant changes. Under reduced funding, I believe (and I would guess many of our customers/partners) the SD is not the ideal use of resources. As I learned working on a bucket team - that with reduced funding all of the activities in a program or in the SD should not be scaled equally. I hope and expect that when the SD gets operationalized under any reduced funding scenario that employees, customers, and partners will get another kick at the cat - since it is at that point when people will likely have much stronger feelings.

Finally, on a similar note - many of the proposed changes are so vague that neither I or anyone else can provide specific feedback of good, bad, indifferent. For example FP-3 -- everyone in the world could quickly agree that we should shift resources to be most efficient. However, that is a very vague statement. When operationalized (e.g. 2 Heavy units and a 4x4 are moved form one dispatch group to another or a year round forest tech becomes a seasonal tech) there will be very strong/ extreme feelings.

Division of Forestry staff

5. Overall it appears this plan is appropriate for the Division of Forestry.

Division of Forestry staff

6. Overall I think the SD is an appropriate role for our Division.

Division of Forestry staff

7. This is an excellent piece of work and will be very helpful in the near future as we attempt to set priorities and deal with our limited resources. Overall, I do support and look forward to aligning our resources and work plans with the

strategic direction that has been identified within this document. I appreciate the countless hours and effort spent putting this direction together.

Division of Forestry staff

8. Unfortunately I think the topics are still too broad for most of the field people to feel like they can comment on. I hope as FOT and FLT struggles with how to make it operational, that field staff will have an opportunity to comment at that time. I am convinced you will get a ton of questions and comments at that point.

Take the fire assessment as another example. When it got into detail in this plan there were plenty of thoughts and good ideas from the field and I would expect the same here if folks are given an opportunity.

Division of Forestry staff

9. The first question "to the strategic direction represent the appropriate role for the Division" the best I can say here is maybe. The proposed changes are vague, so I struggle with their actual intentions. For myself, having an operation plan to accompany them would make it easier to make a decision towards the changes in our roles. I do hope that the Division does not forget who we work for and who depends on us for unbiased professional natural resources advice and assistance.

Division of Forestry staff

10. Ecosystem Services are mentioned in the second paragraph, but not defined. It also mentioned in other area or specific ecosystem services are mentioned. This seems like a great document to really define what ecosystem services are maybe in the up front section and reinforce that with the term in parenthesis after such services are described. The beauty is that this really ties the ecological, economic, and social aspects together which I think is part of the underlying goal of the strategy.

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The proposed change of page 6 is pretty general - that may be necessary. Not sure if it would be worth giving a specific example.

Division of Forestry staff

11. Overall I like what I have read in the Strategic Direction draft.

Division of Forestry staff

12. Overall, I'd have to say I am impressed by the document and your attempts to say what you are going to do more of, what you hope to do less of, and on what you hope to retain focus. Although I did read the whole document, I won't be commenting on everything. Nice job.

Division of Forestry staff

13. Yes, overall I think the SD represents an appropriate role for the Division of Forestry and the best use of resources for the Division.

Division of Forestry staff

14. Overall is a very loose term. I do think that the overall comments and proposed changes within the document do make sense. I will only comment on those changes that I do not agree with and give reasons why and possible solutions. The rest I can live with or do agree with.

Division of Forestry staff

15. Yes, I believe it represents an appropriate role for the Division, but it does not in all cases represent the best use of resources for the Division.

Division of Forestry staff

16. Over all I think the Role and Proposed Changes are appropriate for the Division of Forestry Private Forestry Program. My main caution is that we do not ignore those that have shown a commitment and energy to practice sustainable forestry. These are the people that we can partner with to have a more effective private forestry program in outreach and leading by example. They still need some of support – this may be as simple as providing the technical

advice (speakers) at a woodland owner conference or getting someone to the next step in management when there is no one else to provide the service.

Division of Forestry staff

17. The strategic shifts that are recommended make very good sense to me, especially the forest genetics work, increased emphasis on forest economy and a shift to a stronger technical support role with the counties. The efficiencies/adjustments that you suggest in the fire program will be painful for some staff/partners, but critical to the success of the program and our ability to make the best use of static or declining resources.....Tighter staff scheduling and a stronger analysis of risk/roles vs. effort will save resources for activities that may give us a better return for effort.

Lastly and most importantly, I am really encouraged by the continued emphasis and strong support of the Forest Legacy/forest easement program. I think this is one of the most critical strategic issues for forestry/outdoor recreation/natural resource/economy in the State of Wisconsin, with significant impacts well beyond our borders. Despite the current lull in property values/land speculation, there will be continued pressure on our remaining large blocks of managed forest in Wisconsin. I believe it is vital to protect the integrity of our Wisconsin forests, and I am happy to see strong support for the Forest Legacy program and our county forest partnerships in the Forestry Strategic Direction. We will be more successful/convincing if we can approach the forest land rights discussion from multiple fronts with a strong integration of program interests and good linkage to a wide variety of interest groups. The benefits to sustainable forestry/wood products industry/economy/jobs are obvious, however we could build a much stronger partnership/voice for forest protection with our partners in the outdoor recreation/tourism sectors. Contrasted to various development scenarios.....sustainable forestry also provides very significant environmental benefits in terms of water quality, ground water recharge, climate change, soil retention/enhancement. I attended a recent "Ecological Summit" organized by the WM program (yes, we had FR reps in attendance), and I was quite surprised and encouraged by the ecological significance of our Upper Midwest forests....I always knew our big block forest lands were important, but I did not fully appreciate how extremely significant they are on a local, regional and even global scale. Bill Vander Zouwen, Andy Paulios and other WM/6 staff have some eye-opening data regarding species diversity, land use/vegetative cover trends and ecological significance of our Northern Forests.

We can't buy all of the land rights, but we can extend the reach of public funds with cost sharing, easements and partnerships. In this time of government "retrenchment", we should be resolute to strengthen our message, link with partners and continue to be effective advocates for acquisition of land rights for long term protection of the Wisconsin Forests. Let's work hard to keep Stewardship and the Forest Legacy Program viable in Wisconsin.

Division of Forestry staff

18. In response to you question #1 on page 3 of the strategic plan draft I will comment. Overall, I think the proposal of allocation of resources is good. I appreciate the increase of a percentage point in areas that need a few more resources namely urban forestry, utilization and marketing, and state lands. Small reductions in fire protection, private lands, and county forests should not be a problem. I think resources allocated to fire, and counties may be a little high, so some reduction is warranted.

Division of Forestry staff

19. Overall - Yes, I agree that the SD represents an appropriate role or direction for the Division. The SD took a lot of work and ideas and did a good job of boiling it all down to some core strategies.

Division of Forestry staff

20. I am comfortable with most of what is identified in the DSD. I admit that I struggle with the sense that our role will become more and more that of data manipulators (CO-1, UF-4 and others); but, I think my trepidation is based more on personal lifestyle choice than a reasoned understanding of what will allow sustainable forestry to flourish in Wisconsin.

Division of Forestry staff

21. Yes, [represents appropriate role for Division] although the details are very sketchy.

Division of Forestry staff

22. I am glad to see the Division of Forestry taking a solid look at what we do best and what our partners can help us accomplish. When you look across other Divisions and Bureaus it seems to be unique. By prioritizing our roles we can better manage the resource. The key is playing to our strengths.

Let's face it we work in a dynamic field and department. Change is inevitable.

Division of Forestry staff

23. I believe that this Strategic Direction does represent an appropriate role for the Division of Forestry however, I'm not sure that it is the best use of its resources. The reasoning for this uncertainty is due to the vagueness of the document. It is a framework that could conceivably include any change the Division's FLT can think up (no specific facts, figures, numbers, etc...). I realize that the leadership put a large amount of effort into this but I'm not sure that it truly explains the changes it is implying. Hopefully we'll see some facts and figures after the FOT runs through it.

Division of Forestry staff

24. The Strategic Direction points toward increases to the Recreation and Law Enforcement components of our Program. Yes, I support an increase and it is an appropriate role for the Division.

The Division spends money on publications, radio and TV ads to communicate its message. We have over 2 million visitors who pay us to visit our property, however we do not communicate well our message to these people at our highly visited Nature Center and Ranger Stations, Naturalist programs, or other message delivery systems. Our Naturalist position and program was cut. If our audience is the public at large, then we are missing the boat by not including the people who have chosen to visit us. Two main target groups have been identified: "Baby-boomers" and the younger technology folks, the "Millennials". Many Baby-boomers want a traditional recreational experience; we offer that experience. We need to continue to attract these folks as they seek that experience and our services. We should be doing a better job of attracting more Boomers during the peak season as well as in the shoulder seasons. The younger folks have their smart phones, ipods, tablets, etc. attached to their hips and are statistically disconnected to the natural world. We could develop apps (or work with University students) that these younger folks could download that have interactive property and guided trail maps, tree identification and invasive species guides, scenic routes guides, sunset guide, to name a few relating to the NSF's. There are currently some apps available that serve as field guides by third party developers. We can also reach people via Facebook. We have severely cut back our outreach, these are a few ways we can meet people on their terms or in their classrooms, while providing our message, increasing their awareness, interest and support.

Yes, we also need increases to our Law Enforcement Program (not masked in the Ranger-Operations position or diluted Ranger-Enforcement positions). We need Ranger-Enforcement positions (or a new LEO classification all together) that are focused on law enforcement and public safety all the time. Our Program has 14 NRO Rangers plus 4 credentialed supervisors. These officers are too few in numbers and are thinned out among too many non-law enforcement related tasks. We are highly trained and educated people that serve cross-program functions (Wildfire Investigations, Timber Theft/Harassment of Loggers/equipment). The Forestry Law Enforcement Study supports this. LTE's are a much more cost effective way of completing basic maintenance tasks.

A mechanic and astronaut in the NASA program are equally important to the success of their program. However I would never fly in a shuttle piloted by a mechanic, nor would I if a pilot built the shuttle. From my view, poor morale is the undertow of this survey and our Program. There are root causes of low morale; for LE it is lack of support, systemic watering down of positions, and no/limited two-way dialog. I also work as an Adjunct Instructor at a Police Academy, the leadership qualities between the NSF Program and the College are very stark. Law enforcement officers desperately want good leadership. [Comments included suggested organizational diagram, and tables comparisons of NHAL State Forest to national parks and properties].

Division of Forestry staff

25. I don't have much positive feedback, so I will be brief. It is obvious we are taking another step in the process of giving our jobs away. Our mission statement references our "Partners" and it seems we are not concerned about looking out for our wellbeing, just keeping our partners happy. The private program has been given to consultants, the counties will be offered trinkets, and the fire program will only "complement the capacity of local fire departments". We had a job and did it very well. We were a source of unbiased help for the private landowner, fostered a great relationship with the county, and put the fires out.

I was also disappointed at the answer from Paul when he was questioned about contracting State land timber sale establishment. Paul was just finished talking about "return on investment" etc. and a question was made about why we would spend \$ to set up a sale when current staff could do it as a part of their job. The answer was that it was a political decision. So, I guess we use facts when they support our position and use emotion when they don't.

Division of Forestry staff

26. Given the emphasis on EAB, there are likely some partnership opportunities between LE and Forestry here. Our folks could help with education and enforcement. Would require some discussion obviously.

Division of Forestry staff

27. A periodic, opportunity to meet with Paul DeLong 1/1 to discuss issues would be greatly valued and appreciated. Visits may go a long way to mending the strained relationship which resides in the division. A summer LE ride-along is recommended.

Division of Forestry staff

28. The first time I read it straight through, my initial impression was that it was overly focused on the economic side of things. I understand we are in a changing time and that Wisconsin is "open for business" so it is important to stress how the work we do contributes to the economy of the state. I also understand that we sustainably manage our forests for ecological, social, and economic benefits. No doubt about that. But, we are the DNR and so, to me, our focus is the natural resources, the ecology, the sustainable management first and foremost. I guess I was just disappointed to see the economic seemed to be the focus of many of the statements and I get nervous that our focus could get a bit fuzzy as we move into the future.

I noticed this in the County Forest and Privately Owned Forest Lands sections most predominantly. The introductory paragraphs focused firstly on forest products, economy, jobs, rec, tourism and lastly and sometimes very briefly on the ecological factors. The State Lands section had a much more balanced introduction with a description of ecological benefits, natural communities, etc. I understand that sometimes its hard to talk concretely about the ecological services in the same way that we can talk about the economic benefits, but it was still a bit disheartening to me.

"Specifically, which programs and proposals do you agree or disagree with? Why?"

In terms of the intent statements, some of them were focused on education and outreach, including FP-2, FH-4, and PF-3, I see increasing our efforts in education and outreach as a fairly significant investment. Especially in terms of PF-3, trying to reach out to landowners about forest management who aren't currently enrolled in a program like MFL. Previous efforts, such as BMP monitoring, have shown that it is extremely difficult to get in touch with these people. I agree that more education and outreach is a great investment, so my comment is more that I am just curious as to how this will pan out in terms of investment/resources in the operations plan, as I see it to be a significant investment if we are to change drastically from what we are currently doing.

Division of Forestry staff

29. Overall, the Bureau of Wildlife Management feels that the Strategic Direction does represent an appropriate role for the Division of Forestry and is generally the best use of resources for the Division. The document is well organized, well written, and obviously entailed a great deal of effort. However; it was occasionally difficult to assess how the themes and strategies from the Statewide Assessment and Statewide Strategy were reflected in the choices of direction in this document. We recommend making connections between the first two documents more apparent in this document.

We applaud the Division of Forestry for embarking on this process and we feel that it will help positively shape the future of Wisconsin's Forest resources. We are pleased to see the emphasis placed on working at the landscape-scale in order to reach objectives on public and private lands. Whether that means working on private lands, public lands, urban forests, invasives, or fire landscapes, we think that it's visionary for Forestry to attempt to coordinate work at this scale.

Goals and objectives from the Statewide Forestry Strategy line up very well with those of Wildlife Management. Wisconsin's forests are important habitat for thousands of species of wildlife and offer important areas for Wisconsin's citizens to recreate. We'd like to encourage increased levels of collaboration with Wildlife Management and our partners in the Land Division and outside of the department. Achieving our shared objectives at the landscape scale will require diverse partnerships, increased communication and collaboration. One way to ensure a greater level of collaboration may

be to make better connections between the Strategic Direction and department ecological plans. Endorsing the goals of the Ecosystem Handbook, Wildlife Action Plan or the Upper Miss/Great Lakes Joint Venture Plan would result in a shared vision for the forested landscapes of Wisconsin and would go a long ways towards building collaborative efforts towards those goals.

Division of Forestry staff

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

Division of Forestry staff

31. In general I agree the guidance the strategic direction provides and applaud your efforts to produce this document.

Division of Forestry staff

32. Yes, at this point I believe this represents an appropriate role for the Division. Some of the statements are very vague and some are very exact, so at this time my comments are limited to the following...

Division of Forestry staff

33. Yes – Strategic Direction represents an appropriate role for the Division of Forestry and the best use of resources for the Division

...

I agree with all outlined Division's Roles, the Proposed Changes, and the Maintenances. Ones that I particularly agreed with are CO-1, FH-1, FH-4, FH-2, N-2, PF-3, UF-1, UM-1, CP-3, and CP-8.

Division of Forestry staff

34. Overall, I thought that the SD represented an appropriate role for the Division.

Division of Forestry staff

35. Yes, I agree with the product produced, role of forestry and use of recourses proposed.

Division of Forestry staff

36. Otherwise I'm good with the rest of the document. It was a huge undertaking and I think a good product is being created.

Division of Forestry staff

37. Overall the direction is ok. Change is inevitable and you can change with it and try to make work or go the way of the dinosaurs. But that being said selling the division out is not the way to go either.

Division of Forestry staff

38. In general I find the proposed changes to be appropriate and well thought out.

Division of Forestry staff

39. Overall kudos to all involved with the start up of this planning. We need it as a division.

Division of Forestry staff

40. While well organized and written, describing the complexity, importance and spectrum of the Division's current Forest Management responsibilities, the Direction will not meet what I perceive as the new Administration's vision of the role of Wisconsin Government.

SD 171210 is too complex – it will not be understood nor appreciated by the Secretary or the office of the Governor.

SD 171210 does not reduce Divisional footprint, or State Budget impact. In fact, with only a few reductions in program costs, the direction strives to maintain or expand Division role over current levels. The new administration does not want this – unless we can show that the maintenance of current levels of service and the expansion of future roles will reduce costs (capital and salaries) and reduce Division presence in the new ‘open for business’ landscape.

Next draft must focus more on how our past and current management strategies have enhanced the job opportunities and commerce of Wisconsin and how our future strategy will improve on that while making Forestry’s presence more inconspicuous. Otherwise, this excellent document will be like tossing your orange peel to the dog: it will be generally ignored and returned for ‘improvements’.

Division of Forestry staff

41. Yes – Strategic Direction represents an appropriate role for the Division of Forestry and the best use of resources for the Division.

Division of Forestry staff

42. I think this is a coherent, well thought through document. It provides the skeleton for "fleshing out" the future of forestry in Wisconsin. However, I cannot say this represents an appropriate role for us (DNR) and the best use of our resources. Some of it does, some of it doesn't, as follows below as I see it.

Division of Forestry staff

43. Yes – Strategic Direction represents an appropriate role for the Division of Forestry and the best use of resources for the Division? There wasn't anything that I disagreed with.

Division of Forestry staff

44. First, I must say that a few of the items I’ll share may not be directly related to the strategic direction, or even specifically the Division of Forestry. However, I am taking this opportunity to include a few thoughts that I see are issues that I feel are directly related to our ability, at least locally, to “adapt to new realities”. The comments below are in no particular order of priority.

For some time, we’ve anticipated a huge turnover in our aging work force within the division. With the current economic and political environment, expectations were not only met but surpassed. With a new work force coming in now and in the future, I have a real concern with a lack of experience at the field level, as well as with those quickly promoting into leadership positions without the experience and skill sets to effectively and efficiently do that task. The most troubling thing is that we have in recent years and appear to continue to position our staff as more of the “administrators”, “experts”, and “authorities” of programs and projects. We will soon have staff reviewing, critiquing, and approving or rejecting projects with no real hands on, on the ground field experience behind them. How will we defend ourselves when challenged on a decision when we don’t have the background to back the decision up? An example, how do you tell a county forestry department how they have to set up or document a timber sale when you’ve never done one. How do you reject an MFL plan from a consultant forester if you’ve never written one. Who will our leaders be, and how will they base decisions and make performance measures when we’ve lost our experience? I understand that we are hiring folks that have read about it in a classroom and that we have training programs they can watch. I’ve been to Italy, that doesn’t make me Italian. I’ve played Flight Simulator on my personal computer, that doesn’t make me a pilot!

We have a tremendous number of specialists positions at the area, regional, and central office levels. Seems staff either love or hate these positions. Personally, I feel the concept is good but the use and allocation is questionable. I don’t agree that we need so many issue specific specialists for every little thing within the division, nor should they be all within 1 hour of Madison. You folks have to remember that despite your best efforts, Lodi, not even the Dells is NORTHERN Wisconsin. Its another 3 hours north. I would prefer to see the specialists be at the area and regional levels to better support the field, to stay in touch with the issues in the field, and be a bridge between the field and central office, especially on operational issues. I could see each region having a specialist that covers forest management including tax law LE, and one that covers LE and Fire in each region. Then, each area should have a staff specialist to offer program wide support to the field, as well as the team leaders and area leader to take some pressure off of them, help with workload and vacancy coverage, etc. I believe these positions and support will be even more important with so much transition and lack of experience in our work force now and in the near future.

I believe we have to look at the bulk of our positions and make them more generalized. Force this if necessary. I feel this will fit within the concept of “doing more with less”, offer all staff greater support in time of need and accommodate the shifting of resources, may give staff a greater appreciation for the overall program, and provide greater program wide experience as we look to staff to cover vacancies, promote into leadership roles, etc.

We’ve found that trying to be efficient can result with having to do with “doing more with less”. We’ve lost positions we were told we could not fill, then be told that because they were not filled and they had stayed open so long they were gone. We tried to be more efficient with our travel to save on budget, only to take our vehicles away because we weren’t putting enough miles on them per month to justify them. Recently we were given workload reduction direction. One of those deemed to be a low priority was fire prevention related work. Then in the new direction there are discussions on how prevention needs to be a priority, with some discussion on WUI positions being created and consisting of full time staff. The issue is that staff are damned if they do, and damned if they don’t, twisting in the wind, wondering how do we find ourselves so often caught up in the irony?

I’ve also noticed in my 20+ year career that we are very good at interpreting things to fit our own best interests, and that this often times involves the department not changing policy, but finding a way to push the implementation onto our partners without a full appreciation of their issues and abilities to pick this work up on our behalf. Fire departments across the state differ in their ability to assist with initial attack. Even the same department could have different capabilities from week day to weekend. These are largely volunteers who have to leave work, often times from communities a good distance away, to donate their time. Wildfire isn’t the only service they provide. And, if they are working on attacking the wildfire, who is left to protect structures? The vocational schools locally have also struggled with providing some of the basic training we used to provide. They often times hire our staff to come in as part time instructors anyway due to a lack of qualified instructors on their staff, which only muddies the waters when one person has to work for two state agencies to get the same job done. Contracting with consultants has created more workload on state lands and MFL than it has saved time or money.

The “fire study” has looked at how many type 8’s should be placed in the different landscapes. I believe the area staff are better prepared to assess that need. The study only looked at fuel types and suppression. It did not account for the support role also played with LE, prescribed burning, etc.

All risk IMT’s. Who will do that? We want to throw money at the county forests, privatize state and private lands forestry programs, and still have a fire presence. But we are going to fill the niche of all risk IMT? I have no problem until we reduce the full IMT at the area level and make it regional. Now we have fewer people covering a much bigger area, and some from our partners. I understand what we bring to the table with this and am more than willing to participate. However, we cannot reduce the quantity of IMT’s available, rely as strongly on our partners, and reduce our training in this arena and then expect to expand our services in my opinion.

Either we make an investment in our nursery facilities and staff to make improvements, or we get out of the business. Locally, county forests, industrial forests, and private landowners are going to private nurseries because the quality of stock is so much better.

I applaud that we are looking at doing more with the non tax law landowners. These are the folks coming to us because of a need and an interest in the forest and natural resources in general on and nearby their property. They aren’t looking at simply the tax break. Locally, a huge number of landowners are simply in the MFL for that break. Getting them to do a practice is painful. Often times if they do cut, they do everything they can before it goes into MFL so they don’t have the severance tax to pay, sometimes for the entire length of the contract. They get a free ride, and the township gets nothing but frustration that we hear locally all too often. Then, we make it easy for them by allowing more land to be closed in an ownership, waiving severance at entry, give them extensions to meet mandatory practices due, and on and on. As far as I’m concerned, we should go back to FCL type concept and not allow posting. If you want the tax break, the public must benefit by having access to your property. And, increase the parcel size for entry to a minimum of 40 acres. Our emphasis should be on quality of management, not quantity of entries. We should also have more “eyes” on the industrial accounts. They are driving forest certification, which I have no issue with. What I do have an issue with, is the worst forest management I see practiced is on industrial forest lands, or by industrial forest staff that have purchased a timber sale, etc.

Certification costs need to be passed on, either as a whole or as a percentage, to the county forests. I also feel that when we have vacancies we cannot fill, the threat of layoffs or losing positions, furlough days, and are hiring consultants to do state and private lands management, we then should no longer be cost sharing county forest administrators. If we cannot afford the time and money to fill our own positions, why then are we cost sharing our partners?

Over time, I've watched how budgets are allocated. Recently, I've watched different committees and teams be formed or re-staffed to look at our future. The Northern Region has a greater area we cover, with a high percentage of the DNR Forestry staff for the state, yet we are often given the same allocations as other regions at budget time, or with membership on these teams.

I hear and read comments about the lack of experienced staff stepping up into leadership positions. I take issue with that. There are those interested and willing, but we've been "black listed" in large part because we are outspoken and tell you what we think you need to know, rather than what you want to hear. I've been passed up for promotions and transfers, not because of my job performance, but because I don't match up with the department's "profile". It doesn't matter how passionate or dedicated I am, how many successes I've had, or how well and efficient I do, once labeled that's it. I've applied for and interviewed for positions and my experience with that has left me frustrated and bitter. I'm told I'm a good and valued employee, but evidently not good and valued enough. I've asked to look into career development opportunities and get little to no response. I've asked for feedback on job performance so that I can make any changes necessary to improve my worth as an employee and am told they are not necessary that everything is fine. I've asked to go to leadership training opportunities and been denied, only to have technicians from our area go to the same sessions.

We talk a good game, but it seems we still too often look at the job and not the person in it. We've got some real talent in our division, but remain reluctant to play to an individuals strengths, experience, and interests to fully meet the needs of the resources and public we serve. That person is a technician, therefore they must not have any interest if forest management. That person is a ranger, so they only care about fire. That person is a forester, so don't even bother asking if they would help with the fire program.

The bucket teams were full of field level people with less seniority. You wanted honesty and an open mind, and assumed it couldn't be achieved with us "old farts". First, there are lessons learned that we continue to ignore. I've worked long enough now to see the same mistakes made as years ago, the same solutions come up, and round and round we go. We shouldn't cast aside experience, history, and knowledge. We may have some great ideas for change, or be able to quickly stop changes that may not be in our best interest based on history and experience. But, our "profile" is such that we are the most resistant to change and the least likely to tell you what you wanted to hear. So, lets put younger folks with no experience in a position to set our new direction and future. Go team!!!

Profiles don't work, period! We've been hiring some good folks, but they tend to be very analytical, and tend to fit better into the "group hug" concept. There are a number of positions in sustainably managing our forests where this profile is great. However, fire is not one of them. Historically, our fire positions have been filled with folks with an aggressive, "go get it" type personality. More the Alpha Male or Female. This person can make quick decisions and isn't bogged down by detail. They can fit into more of the line organization, military type setting that often is present. I see our new staff often struggle with this. Having some no nonsense, aggressive, tell it like it is personalities offers us diversity of workforce, ideas, and abilities. Stop profiling. You can group hug on your time.

We have leadership that lacks the field experience, and therefore qualifications, to support and supervise the programs entrusted to them. Then, we have policies, union contracts, etc. that preclude them from addressing issues, making common sense decisions, dealing with disciplinary problems, etc. An example, I was a technician for 7 years and was also a FEC certifier during that time. Our station is a pine station that had a tech vacancy for over 2 years. I am very passionate about our fire responsibilities and expressed my willingness to help out. Even though the opportunity to meet training and certification requirements could be easily met, and Division policies would allow my certification, I was not allowed to because of a verbal agreement made at the area level between the area supervisor and the technicians 30 years ago, and fear of union issues. Instead, an LTE was used at an added operational cost, and where that person could not be placed on FDR for evening response. I have supervisors asking me questions about running the programs in fire and forest management, and I still cannot compete for promotion. Then, people wonder why I grow more frustrated, bitter, negative, and outspoken. In part, I'm a product of what my employer chose me to be.

Customer service needs to be sorted out. Our offices are scattered throughout the state, and are generally concentrated to forestry staff. However, the public doesn't recognize us as forestry, they recognize us as DNR. They have small town mindsets that expect the doors to be open, the phones to be answered, answers to their questions, and response in time of need. We are often the only state office in miles. We aren't just employees, but are residents of communities that address as many customer service issues outside of work and work hours as we do at work. Computer information and "touch tone" is great, but we have a lot of older folks, low income folks, and visitors to the area that need information and may not have a computer or a phone, and if they do they may not have cell service, or even a touch tone phone.

Beyond just the Division of Forestry, or DNR, I feel that a message needs to be sent to the Governor that we need to do away with DOA. One size fits all solutions do not fit statewide. More flexibility in the regions and areas is needed, especially on service and support. A vendor in Madison may not be available in Gordon. An example, we needed to replace a broken windshield at Barnes. The closest contract vendor is in Wausau. We spent more time dealing with them having to come up to us, and that we were not driving 4 hours to them, than had we been able to go locally and just get it done. I can buy station supplies many times cheaper locally than state contract. I could replace my computer every two years with what we spend in "service costs". ARI needs to go!!!! An example, one of our trucks broke down. We took it to the local dealership. DOA and ARI agreed that we could get it fixed cheaper in Madison so we were told to take it there. So, the broke down truck in Spooner has to be towed to Madison. Oh, and DNR nor DOA wasn't going to pay for that, our local budget would. We had a tractor plow that needed track repair. First, we were criticized for taking it out of state, not understanding that Duluth is still two hours travel time closer than any other vendor, and it's the same company. Then, ARI wouldn't pay for it.

Our technicians ended up doing the work themselves that was deemed necessary, but too expensive. Well and good, but then the next complaint is, "why are they spending so much time doing that when they don't have their county forest hours in"? And last, just recently, we had a Type 4 DNR Fire Engine with an electrical issue that shorted out and blew several of the light bulbs on a newer truck. Our DNR mechanic did not have the tools to be able to track the issue down, so they took it to Duluth (OH NO) to have the vendor look at it. The vendor found the problem, fixed it, and replaced the light bulbs so that it would not be in violation on the road. Shortly after, they wanted us to bring the truck back up to Duluth so they could remove the light bulbs. Apparently, after some convincing, ARI agreed to pay for the electrical diagnosis, but refused to pay for the light bulbs. It made more sense for us to send someone for two hours at 125 miles to pull light bulbs out that would have to be replaced anyway than to just pay the bill. You can't make this stuff up.

Division of Forestry staff

45. Overall, I believe that the draft is reasoned and well thought out.

Division of Forestry staff

46. The FR Strategic Direction document is very well done. The document does a very good job to clarify the role mission of DNR FR program vs. what our partners can provide. It will help focus staff to core (DNR) duties and it will be an important document to influence change in the program.

Division of Forestry staff

47. Note: Strategic Directions seems contrary to many "Forestry Division FY'10 Work Plan Accomplishment Reductions October 2009 "email of 10/19/2009

Division of Forestry staff

48. Being part of a law enforcement team that entails officers from around the state of Wisconsin. I have been through several surveys, reorgs, realignments and plans. As in the past it appears that law enforcement has taken a backseat to some of the main topics of the surveys.

Division of Forestry staff

49. I do believe that the purpose and vision of the document was developed in good faith, with much effort and energy, and put forth with the best intentions towards the Division's staff and the resource which it manages.

Division of Forestry staff

I guess—yes—---but honestly not knowing the actual implementation of this SD—ie interpretation of SD—it is difficult to truly assess---I do believe it fails to address the disconnect we saw in the cultural survey results.

50. With customer service having an even more elevated place than it already has---I think we need to more clearly define—how we accomplish this and to WHICH customers directly or indirectly....we provide “service”...

Division of Forestry staff

51. Overall, good articulation of priorities and reallocation of resources.

Division of Forestry staff

52. Question; Will these Superintendants be required to follow this strategic direction or will they be allowed to continue with their own agenda?

Division of Forestry staff

53. Overall I think the strategic direction is strong to what we won't be doing and weak on defining what DNR Forestry's niche should be. To me it was frustrating that I don't have a good idea of what will be expected of staff. I understand that the next version will offer more details, and hope that some of my uncertainties are clarified then.

Division of Forestry staff

54. Overall, the Strategic Direction is well-organized and easy to read and understand. There are some areas where a bit more background and rationale would have been welcome, such as the one, “reduce emphasis on administering the state's forest tax program” (p. 15). Here, I wondered about Forestry's reasons for wanting to reduce this emphasis, and why Forestry thinks the reduction is feasible.

My general impression is that there are a lot of areas where Forestry would like to increase its level of commitment, but few specific areas where cutbacks are identified. It may be necessary to go through some type of prioritization process, as it seems unlikely that all the increases will be possible.

Monitoring is an area that seldom gets a lot of emphasis, but is badly needed to tell us whether our goals and strategies are being implemented and whether they are effective in moving us toward a desired condition. The Strategic Direction calls for an assessment of education and outreach, and for monitoring of tree planting, but there is little else in this category. Monitoring the outcome of timber sales is needed, especially as the emphasis on meeting allowable harvest goals increases at the same time as environmental conditions are changing and making outcomes less predictable. Another area where monitoring is needed is in the use of conservation easements, to determine whether the amount of funds expended are providing a commensurate level of benefit to the public.

...

I was pleased to see the recognition of trends toward increased recreational demands on forested state lands. I wonder if there will be conflicts between recreation goals and allowable harvest goals. Information I've seen recently indicates that overall economic value of recreation on forests in Wisconsin is greater than that of timber programs. Presumably these types of economic figures will be examined and investments allocated to one program or another will be determined partly on this basis.

Division of Forestry staff

55. A disconnect exists between what the document actually “says” (black & white) vs. what it “means” (implementation). People are interpreting the same words differently; are we to respond to the draft strategic plan or to Dick's follow-up explanatory letter. Some may interpret “Division” as meaning central office rather than being inclusive of regional/field staff too. Change to “Division of Forestry”. The rest of us have to “catch up” to the process, the recommendations, the changes and the efforts/products produced, we need to see some patience and understanding during our learning curve. We need to first understand the implications of the changes to how we do our job and what it means to me before I can relate to the big picture strategies.

Division of Forestry staff

56. I first want to comment concerning a general feeling that it seems the staff is experiencing through-out the State. It seems almost a feeling of depression that is due to multiple factors.

1. Feeling of being unappreciated by the in coming administration.
2. Potential changes to programs that many have worked passionately on over their careers.
3. The mass exodus and feeling of abandonment of fellow employees, friends and colleagues from the program.

I am sure Paul is aware of this but when staff responds to this process keep in mind the feelings they are struggling with. In general I think the new Administration will look at the Forestry program in a good light. In many respects we are a job producer, and I expect industry and the counties will bend their ear in our direction.

Division of Forestry staff

57. One was "what will it take to feel ownership of the Strategic direction" I think only the people involved up to this point will feel real ownership. The comment period and meeting are nice but won't give most people that sense of ownership. The response to comments provided is likely the area to improve the "ownership" feeling. The difficulty in commenting is the vague nature of the strategic direction. Of course in this phase the direction will be vague and operations will need to settle what these directions really mean but this must be understood as a limitation. It is hard to comment without knowing some specifics which have not been developed. For example: spending less time on MFL without sacrificing quality sounds great but I don't have much confidence in it as I wrote above. If it can be done correctly I would be very happy to spend more of my time doing other things.

Division of Forestry staff

58. Overall the strategic direction looks good and I appreciate the opportunity I had for involvement in the process. The bucket teams while made for many workload challenges definitely provided for opportunities to really examine the programs. I think more time may have helped the teams refine their suggestions but I think FLT got the information anyway.

Division of Forestry staff

59. First, I appreciate the offer to contribute comments on the plan. I applaud the work completed to date and the commitment to follow through by FLT. I agree with the slight shifts in percentages, as identified by the charts. This will make transitions easier for those who struggle with change, and slowly ease out of less priority work. Additionally, the slow increase in other areas will allow the 'partners' with which you work in those areas to keep up with the increase work in these areas by the foresters. FLT, and especially it's leader, are exceptional visionaries. You have my commitment to ensure your efforts succeed.

Division of Forestry staff

60. Also, I feel the strategic plan process is a great way to articulate what the Division of Forestry (DOF) actually does in a general sense and where DOF is going. Ever since I came to DOF, I felt we needed to better articulate the great value and service we provide (tell the good story so to speak). So many tax payers don't know what value we provide or what we do.

Division of Forestry staff

61. I think overall the SD does represent an appropriate role for the DOF. However, I need to also state some of the proposals I strongly disagree with, some of the proposals appear to have a hidden agenda, plus the overall SD seems very ambitious. Some of the proposals will change my position description and some of the proposals are going to be costly even those proposed to be completed by NON-DNR personnel and therefore considered to be less costly.

Before I begin to answer this question, I have one question and a few observations. The question has to do with where information was gathered for these proposals. Were all the proposals a result of the responses to SD version 1 spreadsheet that was generated last year? If so, I can not see how these proposals were the outcome of responses from that spreadsheet! Another observation I have is that with some of the proposals there is a "disconnect" between the DOF leadership (or whoever proposed the proposals) and the field staff who are the implementers and administrators of the DOF programs. Another observation previously stated is there appears to be a hidden agenda with the SD. How can a member of the DOF leadership make a presentation to discuss the RESULTS of the SD on February 9, 2011 at the Cooperating Foresters Annual Meeting when the DEADLINE for comments is February 4, 2011! For me, this was a red flag, with the implications that the SD is not a draft or proposals, but an actuality!

Division of Forestry staff

PUBLIC COMMENTS

62. I believe the DNR holds a prominent role in the conservation of Wisconsin's forest resources as well as in sustaining the vitality of state's economy that depends directly or indirectly on our forest resources. The strength and backbone of that role lies in the investments of positions as well as fiscal resources that produce tangible benefits for both public and private forest landowners across the state.

One discouraging theme that I noted after reviewing these draft proposals several times is a subtle but strong push to increase investments in programs administered through the DNR central office while decreasing programs involved with field delivery of sustainable forestry for public and private landowners. Ultimately, it's the practices on the ground that affects the future of Wisconsin's forests, so field level resources shouldn't be shortchanged.

I extend my encouragement and support as the DNR works to define its clear role.

M. Luedeke

63. From the Natural Resources Conservation Service's perspective, and realizing the economic and political climate of today, NRCS believes it is important for the Division to maintain local expertise and assistance for the management of Wisconsin's Forests. The draft Strategic Direction appears to allow the flexibility for the Division to maintain that critical role. NRCS along with State, Local Agencies and other Units of Government depend on the Division of Forestry to maintain this area of expertise.

G. Rebman, USDA-NRCS

64. I am glad to see that you have included a strong statement about the Economic and Social importance of Wisconsin's forests with supporting data. This has been lacking in both State and federal statements. The data we have heard at forestry programs such as the 2010 session in Ashland showed a decline in forestry related businesses in Wisconsin such as wood process facilities, paper mills shutting down machines, a lack of investments in plants, etc. The negative effects of the decline have and are affecting communities, especially in Northern Wisconsin. Lost jobs, lost tax base, lost services, and virtually every school is suffering because of declining enrollments to name a few.

You state that, "The ability of Wisconsin's forests to continue to support existing and emerging industries ...", as a whole the forests of Wisconsin have not been doing this. As noted above there has been a reduction in the industry and we do not see any significant new ones emerging.

Forests must be managed sustainably to be able to produce the many benefits they can provide. The Plans completed by public agencies do a good job of ensuring sustainable management of the varied resources, the Certification process adds another layer of insurance, and the MFL program lands are well managed.

A significant problem is that, with the exception of County Forests, the public lands with detailed Forest Plans do not produce the volumes of wood that they could and further what they do produce is sold with an erratic schedule that no one can use to plan their operations and investments.

Here are a couple of examples: The CNNF has an ASQ of 133 million and sells half or a little more of this volume. They spent \$8 million and 8 years developing the Forest Plan that contains this amount. The sales they do sell are mostly appealed and often litigated causing long time frames before proposed timber can be sold if it ever is sold. The result is an erratic timber sale program that is unpredictable for industry.

The DNR has Management plans for all of the State Forests that include an ASQ for them. Again, the State does not sell the ASQ for each Forest annually. Further, in checking with the Brule Forest in our area, I find that the DNR arbitrarily reduced the ASQ from the Plan amount by half for the Forest.

For any business it is critical to have a sustained amount of raw material, or product(s) to sell, available on a reasonably uniform annual schedule. The wood industry is no different.

The "Assessment", the "Statewide Strategy", and this document need to address this problem directly and provide the leadership text materials to frame this problem and the leadership "niche" to bring the involved agencies and other appropriate people together to reach a unified solution.

There is wide-spread unemployment nationally, Wisconsin has high unemployment and has lost thousands of manufacturing jobs, and the 2010 elections were a show case for politicians saying that they were going to create jobs. Wisconsin has the Forest resources and they are not being made fully available to help create jobs, not lose jobs.

N. Paulson

65. Because of statutory and policy limitations, review from CNNF resource specialists focused on Fire Protection, Forest Health, Nurseries, and Cross-Program Activities. It was the consensus of the reviewers that the Division of Forestry's role, proposed changes, and continuance of existing programs to whatever degree possible, were appropriate given the anticipated reduction of financial and other resources.

P. Strong, CNNF

66. Lake States Lumber Association (LSLA) is interested in seeing the DNR be a stronger advocate for the economic health of the state's forests, including Wisconsin's US Forest Service land. The DNR should protest the dismal performance of the Forest Service in meeting its timber sales goals of putting timber on the market. Similarly, the DNR should borrow a page from the Department of Agriculture and advocate for improved rail and transload facilities to bring Wisconsin timber to world markets.

LSLA is interested in seeing line authority within the DNR so that its foresters report directly to the State Forester.

LSLA supports the Strategic Direction initiative to find incentives to promote the practice of sustainable forestry on non-MFL lands. Former Chief State Forester Gene Francisco advocated "MFL-Lite," which accomplished this goal. Perhaps Francisco should serve as a consultant to develop such a program.

LSLA is concerned that managing for old growth, does not necessarily serve the health of the forests and its economic impact on industry.

Following are remarks from a Lake States Lumber Association member:

"The original mission of the BCPL was to sell off federal lands deeded to the states. They have a fund with millions of dollars that was to be used to loan money to schools.

BCPL land should continue to be sold to private interests instead of more public land. We already have too much public land that is being mismanaged. My place up north is surrounded by the Northern Highlands State Forest. It's nothing but a big park. Not a twig for a deer or rabbit to hide in or chew. On one 40 just down the road they performed a big tree silviculture cut a few years ago. They left mature red pine, white pine and paper birch. The idiots, who most likely claim to be foresters, were too stupid to realize that the paper birch in the area is over mature and dying, being hit hard by the bronze birch borer. In the few years since the cut, the birch they left have all died and are falling over. There's no regeneration in the under story except for a few pines, with the new growth being hazelnut. Hazelnut is a good wildlife food, but forest regeneration is lacking.

The BCPL should complete their mission by selling off their lands in auction to private investors. We'll have to think about what to advise they do with the funds, which should be put to use according to the groups charter. There are a lot of schools in the north in need of help."

In the short term, LSLA is interested in seeing BCPL lands administered under the Division of Forestry and that location of such lands be made public to facilitate public access. Currently there is no such map available from the BCPL.

In the long term, such lands could be sold with conservation easements attached. To facilitate public access to publicly held lands, a map should be made available to the public depicting country, state, open-MFL, BCPL and Forest service land.

Lake States Lumber Assoc.

67. Please do not discontinue service to individual communities. The DNR has built a top-notch program. Let's keep it going. Innumerable benefits have been delivered via the current regional staff.

Partnerships are great, but don't do half the job. Right now the DNR is structured to provide individualized service. Find methods to provide partnerships and provide expertise in that area. I am a person who likes to see how something will be done. Great idea, but how will you do this? I recognize this is a very 'nuts and bolts' statement and might not be appropriate for the strategies at this time. Maybe just acknowledge that some changes will be made?

Wording is very difficult to understand. Please use better verbiage. Particularly words such as metropolitan need to be clearly defined or simply use a better term.

K.Tuttle, Bluestem Forestry Consulting, Inc., Drummond, WI

68. We agree with most of the statement in sentence one of paragraph two, however it is unclear as to what we are protecting the forest from if they are sustainably managed. We agree with, and it is GLTPA'S goal as well, to make sure Wisconsin's forests support existing and emerging industries while providing recreational opportunities to the citizens of Wisconsin much like it has over the last 100 years. The goal of good management is becoming harder to achieve on the ground because of increased operating costs stemming from lack of available raw material for sale and more regulations which have contributed directly to the loss of manufacturing facilities throughout the state over the last decade.

The sentence "We, in the DNR's Division of Forestry, are responsible for developing and implementing programs to protect and sustainably manage the state's forest resources" should be changed to read; "We, in the DNR's Division of Forestry are responsible for coordinating with stakeholders to develop programs that will aid and enhance use of the states forest resources. It is the GLTPA's position that DNR should engage discussion with stakeholders during the development of documents rather than waiting until a draft is complete.

Overall the Strategic Direction should work toward increasing production levels and opportunities for land users and not simply maintain what is currently available. The Strategic Direction should also take into account and give full credibility to the expertise of non- department personal and managers of other lands such as county and some tribal lands and use their work as a tool to advance the services the forest supplies to industry, recreation, and ecosystems with emphasis on industry.

H. Schienbeck, Great Lakes Timber Professionals Association

69. A point of clarification... I'm not in favor of DNR managing BCPL lands. If they do, they'll have to complete a management plan, which will take years and will include all of the mismanagement techniques they current employ on existing State Forests. In the meantime there won't be any timber cut. The timber programs on the State Forests aren't much different than the Forest Service lands. Closing BCPL and transferring the lands to DNR control really wouldn't accomplish anything except to eliminate one state agency.

70. A suggestion might be to transfer them to County management until they are sold. The Counties at least realize the value of their timber base and timber revenue is used to supplement their budgets.

R. Degen, Bennett Hardwoods

71. Overall, I agree that the Strategic Direction represents an appropriate role for the Division except in those few programs and proposals that I have indicated below. Where I did not comment on a specific program and intent statement, it means that I agree with the statement as proposed.

T. Mulhern Forestry

72. Overall, the Task Force is pleased with the draft Strategic Direction as it promotes sustainable ecosystem management and conserves the diversity of natural resources. The Task Force's primary concern is the document's failure to recognize the Tribes' exercise of their treaty rights as part of a relationship with the natural world. The exercise of these rights is a part of the natural and necessary processes that occur within Wisconsin's forests and is, in fact, an element of sustainable management. If implemented according to this philosophy, this plan could be an important component in the protection of habitats that support Tribal ceded territory treaty rights.

The Task Force appreciates the dialogue that has occurred between the WDNR and the Task Force during the planning process. It is imperative to develop a similar level of dialogue at the individual tribal level. The Task Force reminds the WDNR that both levels of consultation should continue into the future. The Strategic Direction should include a statement

that describes the location of the ceded territories and the State Forests found within, and describes future consultations in the planning process.

The WDNR recognizes the Tribes' treaty-guaranteed hunting, fishing, and gathering rights. However, the Strategic Direction should acknowledge these treaty-guaranteed rights with a specific statement to that effect. Also, the Strategic Direction must include a statement which specifies that nothing in this plan shall in any way infringe upon the tribes' existing treaty reserved rights.

The tribes have voiced concern on several occasions about restricted access interfering with the exercise of their treaty rights on State Forests. It is very important that questions of transportation management be discussed with the Tribes so that a complete understanding is achieved vis a vis road or other travel corridor closures.

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

J.E. Zorn, Voigt Intertribal Task Force of the Great Lakes Indian Fish and Wildlife Commission (GLIFWC),

73. I made a cursory review of the Draft Forestry Strategic Direction today and was generally pleased with how well thought it seemed to be; with one notable exception. Unless I missed it, there seemed to be no mention of or provision to deal with the 800 lb. gorilla in the room. I am referring to the import of subsidized or at least not true cost foreign paper into this country, and the devastating impact that is having on the u.s. pulp and paper industry centered here in Wisconsin. If there is any high level attention being given to this huge economic matter it has sure escaped me. The new administration seems more intent on pushing a social agenda and luring outside jobs, while a leading industry teeters on the brink of extinction with loss of some of the best jobs we have.

So, lacking other effort to at least slow this erosion I would hope the Strategic Direction would at least provide for analysis of the issue. The Forests As Economic Contributors section seems like a place where this concern could be rightfully addressed. If not there, then by who? And where? And when?

Many northern Wisconsin cities like Ladysmith are already struggling. Further downturns in the forest industry so vital to our local economies will threaten our whole way of life.

A. Christianson, city of Ladysmith

74. I like the emphasis on NIPF, invasives and the need to reach landowners not currently doing any management. All around, a great job.

G. Roark

75. From a broad perspective, the December 17, 2010 version of the draft document reflects a reasoned, considered approach to the environmental, social and economic issues affecting Wisconsin's public and private forests, the operations and roles of the Division of Forestry, and the resulting impacts on its cooperators and stakeholders.

The Paper Council recognizes the commitment and work performed by DNR personnel to produce the document. While we do not endorse every aspect of the Strategic Direction, creation of the document to this point can serve as a model of how the Wisconsin idea, engaging public and private resources for the benefit of the state's resources, citizens and economy, should function.

E. Gustafson, Wis. Paper Council

76. I generally support the direction of the strategic plan.

W. Kiefer, Nebagomon, WI

77. From what I saw, I think [the SD] it is appropriate. I want to see a variety of forests available in the state, old forests, young succession forests, and a mixture of other forests.

T. Eisele, forest owner, Crawford, Co

78. I have reviewed the entire Strategic Direction Draft and I am in overall agreement with the document.
K. Ottman, First Choice Tree Care, Junction City, WI

79. In general, I think the Strategic Direction provides a thoughtful and thorough approach that can serve as a framework for future decision making. While much of the latest draft appears to be supportive of sustainable forests and healthy forest communities, there are a few items that do concern me.
S.Kariainen, Louisiana Pacific Corporation

80. Overall, I think the Strategic Direction makes sense given the resources the Division has.
J. Solin, UWSP

81. Overall, we thought the document was well written and identifies many of the roles the Division of Forestry should fulfill. Nevertheless, we believe there are a few areas that should be reinforced; specifically, the Utilization and Marketing section, the Cross Program Activities section, and the Appendix. We believe more attention should be paid to the following points. [see comments at Utilization & Marketing and at Cross Programs]
D. Donovan, Excel Energy

82. AFF and ALF commend the Division of Forestry and its leadership for the thinking and approach framed by the Strategic Directions. While there are many details to work through during implementation, the Division has established a solid, strategic context for determining how it can have maximum impact with its resources to help landowners manage and protect Wisconsin's forests over the next five years. We believe this framework can be a useful and practical tool to inform decision-making. We support its overall objectives to focus on results, efficiencies, and return on investment, all within the context of complementing and augmenting the work of the others working to protect our forests.
J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

83. Once again, we commend you on the development of a strategic direction to move Wisconsin's forestry community forward.
We agree with the statement; "The major issues and threats affecting the forests of Wisconsin can not be tackled by one group, organization or agency." Wisconsin's forestry community must work collectively to overcome new challenges, especially in today's difficult fiscal climate.
We do feel, overall, the Strategic Direction represents an appropriate role for the Division of Forestry and will make the best use of resources within the Division. That being said, we do have some concerns and suggestions within specific areas of the document.
The pie-chart illustration entitled "Division of Forestry Investment Distribution" that was developed as an addendum to the text document causes concern among some of our members. We discussed the document at our meeting with you on January 6 in Wausau but still maintain that if taken at face value this document shows a 1% reduction in investments to county forests and a 1% increase to state forests. Language in CO-1 is helpful in explaining the proposed reduction, but again, if taken at face value individuals may arrive at their own conclusions.
J. Severt, Wisconsin County Forests Association

ABOUT INVESTMENT / TRADE OFF

DNR STAFF COMMENTS

84. I have not suggested increasing investments. However, if the Division needs to prioritize cost savings, I suggest starting with CO-1 and UF-1. B.

Division of Forestry staff

85. What trade-offs would you make in order to increase the investment of resources in a program? Not sure about this, I don't think areas of commented on involve major shifts from what is already outlined. My overall concern is that when building capacity in our partners we need to stay along for the whole ride. We can not build the partnership and then walk away and think that the partners will then carry the torch on their own. This is true for partnerships in all of the program areas listed in the strategic direction.

Division of Forestry staff

86. Consider moving forestry personnel across the state to accomplish tasks such as timber marking, forest recon., etc. just like with the fire program. There are opportunities for our own staff to accomplish tasks without contracting but resources need to be moved around as needed. Look at marking camps. This is a win/win as it accomplishes tasks and allows some employees opportunities to do real forestry again. Our state lands should be the shining example to our public.

Division of Forestry staff

87. I'm not sure that now is the time to increase much of anything, until the economy turns around. Thanks for the opportunity to comment.

Division of Forestry staff

88. I do not have any specific suggestions to increase/decrease based on this draft. It is to vague in many areas to address. Under anything but a 100% funding scenario there are areas that I think should be prioritized for funding/cutting - but this does not seem like the time or place to make those comments.

Division of Forestry staff

89. You will be able to discuss the draft and ask questions during the statewide meetings being held in January. I also encourage you to discuss your questions and comments with your FLT representative.

Thank you in advance for your time and attention in helping shape our future.

Division of Forestry staff

90. Not sure I suggested too much re-allocation. Other than I guess I am looking for additional resources to update the recon in advance of master planning for other department properties. If you some how miraculously get a statute change to allow timber sale revenues to stay with the property - that could pay for that recon. But assuming that is a long shot, and following your direction, I guess I would reallocate resources from UF-4 in favor of accomplishing this objective on the master plans for our own properties.

Division of Forestry staff

91. I am not suggesting an increase or decrease in investment from what is being proposed in the Strategic Direction. I think the changes in investment across all of the programs are reasonable and are based mainly on society's trends and new studies/research that was done to determine where our funding needs to go.

Division of Forestry staff

92. Reduce the time invested in the county forest and place more in State land.

Division of Forestry staff

93. Utilizing partners is vital however it seems to be a double edged sword. As we trade-off services we incur the responsibility of administering and regulating.

We must continue to promote “partners” not private business referral systems. We need to develop cohesive partnerships with compatible missions. Time spent with true partners will reduce the resources exhausted for administration and regulation. By promoting the right partnerships we will have to make few trade-offs and will accomplish much more.

Integrating resources (equipment and personnel) is also important. We are professionals and can perform multiple duties and should be expected to do so.

Division of Forestry staff

94. The Strategic Direction has recommended increases (i.e. WUI) and decreases (i.e. County Forests) to specific program areas without adequately studying and addressing fire and forest management integration, as well as personnel and assignment efficiencies and inefficiencies. Our Division can accomplish more, with less, simply by increasing our Fire/Forestry integration, as well as making under-productive employees/positions more productive.

Division of Forestry staff

95. First of all, I understand what Paul DeLong has said about the Strategic Direction not being a budget reduction exercise or operations plan or how we will carry out this work. However, the bottom line is always funding. After reading the draft plan I do not think there is enough reductions in all of the programs, and with inevitable budget cuts up-coming, the Division of Forestry will not be able to maintain these programs as proposed.

What I do not understand is why there has been little or no discussion about big spending items like building projects and other development projects that may not be needed. I feel there is a lot of money "out there" that could be put to a better use, like accomplishing the goals of the Divisions programs. When I have brought up this subject in the past, I have been told by supervisors that the funding for these projects comes out of a different "pot" and quite frankly I am tired of hearing that. Lets face it people, there is only one "pot" and that is the "back pocket" of the tax payers of the State of Wisconsin.

Examples of this unnecessary spending, in my opinion, would be the new office building in Spooner, the proposed new office building at Flambeau River State Forest, the new boat landing at Lake of The Pines (FRSF), and numerous other projects across the state that would be nice but not absolutely needed at this time. Another example of unnecessary spending is when, at the end of a fiscal year, money needs to be spent. Why? Because the old saying is "you have to spend the money to show a need so you can get more money next year". I have worked for the DNR now for 10 years, with most of my career being spent in the private sector. I was a private contractor and ran a successful business for almost 30 years. Not one time during that 30 years did that concept apply. I think that it is time for that concept and the attitude that brought about that concept to be changed.

What would be wrong with the attitude that if you didn't need the money, to give it back to be used by some other program that actually needed it. The whole system would be based on absolute need. This attitude has to start at the top and go all the way to the bottom and at all levels of our state government. I think it is time for state government to start living within its means as the private sector has to do.

I realize that this is not the kind of comments you are looking for, and it is not specific to the programs and proposals, but I truly believe that if unnecessary spending was changed to absolute need spending, there would be adequate funding for the necessary programs of the Strategic Direction. If we don't make a change I am afraid the Strategic Direction will be a downhill slide to the bottom. Thanks for letting me comment.

Division of Forestry staff

96. I think the Department can do what we are currently doing with less, but one of the areas that need to be addressed is staff accountability. We need leadership to hold their staff accountable for their actions, accomplishments and their budgets. One good example would be the (Tim) Friedrich/ Sloan/ Grossman Budget approach. In the north team (Oneida/ Vilas) of the Headwaters Area, we are given station budget allotments, we know how we have to spend and the expectation is that we will stay within budget. We are meeting expectations and staying within allotted budgets. Micro-management is not the answer, but trust between management (who sets the goals) and staff (who accomplishes the goals) needs to exist.

All too often it seems that staff is not being given clear goals and management is not hands-on enough to know if the expectations are being met. If managers know only from quarterly reports what is being accomplished, they need to take a more active role. Some of the best things that management can do are: 1) Set clear, reasonable and locally specific and focused goals, 2) know what their staff is doing, identify barriers to accomplishments and if possible duplicate successes and 3) hold staff accountable and be able to justify legitimate shortfalls and strategize how to overcome them. High and reasonable expectations, common sense and good communication can go along way.

Regarding overall what we should be doing less of and what we should be doing more or less of, my answer is "It depends". Because of the variance in a forestry area's focus, management needs to be flexible and allow middle management to help develop strategies and goals that will most benefit the resources under their jurisdiction and are meeting the Divisions Mission. Too many broad brushes will overburden some areas and leave other twiddling their thumbs. Its time to allow middle management to identify strengths and weaknesses within their teams, and develop strategies to refocus staff or mobilize staff to address areas of concern. Management needs to unify staff in areas of the state where there is the sentiment that they have forestry staff and they have separate fire control staff. Traditionally fire only staff will have to step up with forestry work and as needed traditionally forestry staff may be asked to assist with fire control (in the field or as IMT members) as deemed necessary. Work planning should be on-going and encourage managers to interact more with staff and less with spreadsheets. That may call for better skill development for managers, but supervisors can't be doormats and need to set direction, establish goals and put their foot down if the right work is not being done. If boots are not getting dirty and the right paperwork is not being done, direct supervisors need to step outside of their comfort and hold their staff accountable. Allow managers to manage, set reasonable expectations and hold people accountable.

Division of Forestry staff

97. Urban Forestry was the only area I may have suggested an increase in investments due to no decrease in the outreach or education - UF-5. If the reforestation and implementation of recreational activities on State Lands were not a part of the SD, this is where the allocation of investment could be derived. I do have a concern on several of the investments' implementation and where the monies will be procured. Again, the SD is very ambitious!

Division of Forestry staff

PUBLIC COMMENTS

98. My first comment is that it is difficult to ask the public to evaluate these proposals without having information or background in what resources (\$\$ and positions) the Division already invests in different programs administered through the DNR. What is the scale or impact of the current resource allocation versus what is being proposed? For example, how many \$\$\$ and positions/hours does the Division invest in the current private forestry program and what changes to those allocations for the private forestry program are proposed under the draft recommendations. It would have been helpful for each draft recommendation to include an estimate of current resources invested (\$ and positions/hours) and what future investments would be made. I believe estimates of these investments have been developed internally by the DNR and this information should have been provided as well during this public comment period.

M. Luedeke

99. I believe that everyone benefits from well managed forests. I also realize that DNR does not have enough funds for everything that everyone wants you to do. But, I strongly believe that DNR foresters are very valuable resources to private landowners and I have had the opportunity to work with several DNR foresters and have very high regard for them. I do NOT think the load should be shifted completely onto the shoulders of private consultant foresters. I thus feel that rather than eliminating their contact with private landowners there should be more contact by DNR foresters with private landowners. Unfortunately I do not have ideas of where those resources should come from within the current budget, but I do believe that this state needs alternative financing to natural resources and I strongly encourage the DNR to request an alternative funding package, such as 1/8 of 1% of the state sales tax being devoted to natural resources. This could help fund additional DNR foresters to work with private landowners, and also fund easements on more forest lands and wetlands and grasslands (we need a diversity of habitat). Although the current political climate is not amenable to new taxes and new programs, I think that Wisconsin needs ways that have been successful in Missouri

and now in Minnesota, to find new funds to preserve and improve our forest and wetland resources before they are paved over with concrete and turned into housing developments!

T. Eisele, non-industrial forest owner, Crawford, Co

100. I think this all essential services/efforts that address high priority needs in the state and generally provide high leverage for their investment.

J. Solin, UWSP

- Program Comments -

COUNTY FORESTS (CO)

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.

DNR STAFF COMMENTS

101. I was glad to hear that the Liaison position is seen as a very valuable position. I think it is a good idea for the State to continue to be directly involved with the County Forest program. This has been a long time partnership and it would be a bad idea to not continue it.

Allowing flexibility is a good idea. I know of some counties like here in XXX County where the DNR / County relationship is very equal. Liaison and county forest administrator talk constantly, work together often, and have a great relationship together. Others have a large County Forest staff already and don't really need DNR help as much. Even in these cases, I think the DNR should still be involved.

Division of Forestry staff

102. Not too much to comment, it is the ultimate field job. One thought: the county forest system should not be immune to our internal cutbacks. For example, when we had 16 furlough days over the past 2 fiscal years, we did NOT see a reduction in statewide county time standards of 3%. I believe we should have. If we have more furloughs in the future, I hope all facets of what we do are uniformly scaled back, the county being no exception.

Division of Forestry staff

103. If there is any program that can be scaled back, it is this one. At least for many of the northern counties. For many decades the DNR forester was the only one doing county forestry work. Now as the forests are maturing and the value of those products has increased, the counties are able to provide for themselves more. So, other than oversight we do now, why are we placating the politics and requiring a certain amount of county hours every year. Seems to me this is one program that needs to be scaled back. Don't forget, if it were not for the department these county forests would not have existed.

Division of Forestry staff

104. Being involved with the County program for over 25 years, I have seen it grow from infancy to maturity. I agree that the level of maturity varies and that the approach should be on a sliding scale. A caution however is that we should always be on guard of being put in a regulatory role. The best approach I have seen is for us to stay closely aligned to the field operations and in a true partnership role. It is easier to work side by side with them and slowly steer them in the right direction rather than promoting additional independence and attempt to fix problems through a regulatory role. The best lesson learned here is with our neighbors to the west Minnesota, who pulled drastically out of the Counties program and it continues to be difficult to initiate statewide programs as they all somewhat work independently.

The County program remains the king of our public land base. Thirty years ago we where a strongly invited guest today in reality we are not as many of the counties can fly solo. Efforts should not reduced in hours provided as this is the basis of

the partnership. If needed a shift of hours provided to private forestry should be considered as additional public returns are achieved from the county program.

In Summary: Stay strongly involved, working side by side with the counties. Be cautious in how independent you want them to become, because they will want it and there will be collateral damage.

Division of Forestry staff

105. Overall supportive of the direction and the concept of allowing counties the choice in selecting the suite of services that best compliments the needs of the individual county forest.

There is a strong need to maintain the DNR liaison partnership. Although there may be areas where these partnerships are tested at times, this is a very good check in the system and provides accountability and credibility to both the County forests and the Division of Forestry.

The Division of Forestry should continue to monitor and be proactive on issues regarding forest certification and its implementation on the county forests. This has and can continue to be a point of friction.

Division of Forestry staff

106. Agree with our role and proposed change OK.

Division of Forestry staff

107. Meeting the individual needs of the different counties is a good idea. However we need to be transparent with what each county is receiving so there is no confusion as to why this county is getting this type of assistance and that county is getting something different from our staff.

Division of Forestry staff

108. I see some problems with the proposed changes to allow more flexibility in the help we provide to the county. The suggestion is to provide more support type services than the traditional field work but leave it up to the individual county to decide meaning each county could request something different and also change the request. I see this as perhaps being difficult to get a match between the available expertise and the requests of the county. Often the county workload is divided between foresters and technicians in more traditionally field type work. If a county would like to switch most of their help to a specialized support service, say Gis, what if the available workforce doesn't have that expertise. Then do we invest in getting all those personal trained up as Gis experts or pull from expertise elsewhere in the state. And if we pull in expertise from somewhere else what workload do we substitute to the former field personal (especially to those with part- time county hours). This can lead to problems down the road as each county type position may need be so specialized to that county that it would make it difficult to transfer between jobs I realize that the work and skills are always evolving and that a gradual transition to give the county access to perhaps several support type experts as a portion of their hours may work out fine but it can go too far.

Division of Forestry staff

109. In general I think we need to reevaluate our county commitments. We may need to reallocate some resources from this area. Often, I believe our state lands commitments suffer from our emphasis on the politically charged county forest commitments. This is a tough issue that needs to be addressed at some point.

Division of Forestry staff

110. I like the idea of offering more flexibility in the services we provide to county forests. For small forests, like Vernon County, they do not always need the DNR forester time, but they could use other resources that the Division offers, such as land acquisition dollars and services.

I think we should state that DNR liaisons will remain a critical component of serving local county forest needs, it just may not require the same time commitment if the county has the capacity to handle the workload and would like other services more.

Division of Forestry staff

111. I agree with this proposal. Glad to see the increase in IT and GIS in the cross-program activities. We definitely need more resources here to keep up with counties. Hopefully some FTE positions created here.

Division of Forestry staff

112. I do not have a strong working knowledge of our current role and effort here. CO-1 sounds like we will be REDUCING the field work services we provide and replacing it with IT and grants for the counties. What is our gain in doing this?

Division of Forestry staff

113. The Bureau of WM agrees with the Strategic Direction on the importance of the County Forest system from both an ecological and economic point of view. As the Division of Forestry works to offer more flexibility in the types of assistance that counties receive, we'd welcome the opportunity to work with the Division and the counties on the types of assistance that helps us meet our ecological and recreational goals.

The BWM is somewhat concerned that we may be reducing our investment in grants that allow for wildlife management strategies to be implemented on county forests. We'd encourage the Division of Forestry to maintain those grants as part of the suite of services that it provides to the counties.

DNR staff (non-Forestry)

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

DNR staff (non-Forestry)

115. We would like clarification on how the proposed shifts in Division support to the County Forests might impact the extent to which County Forest lands are managed for ecological and recreational benefits. While our Region has no County Forests, we recognize their critical importance to conservation, biodiversity and recreation across the state.

Division of Forestry staff

PUBLIC COMMENTS

116. We are concerned with references to landscape planning relative to multiple counties. While awareness of common or shared multi-county issues and opportunities should be beneficial, it should not come at the expense of county autonomy to manage resources as they deem appropriate (while complying with federal and state statutes and codes and local regulations or ordinances). If landscape planning is viewed by the Division of Forestry to be a voluntary tool that can yield benefits – for example, improved efficiencies between counties – that is reasonable. It should not be a command and control harness. Speaking broadly, the Paper Council believes the counties have been very effective in promoting good forest management.

E. Gustafson, Wis. Paper Council

117. The proposed increase in GIS assistance to County Forests should be cut and put back into assistance in time & grants from the DNR to County Forests. An increase in GIS funding will only increase the number of DNR forestry people who sit at desks and go to meetings, which is already starting to increase at an alarming rate. I wholly support the County Forest program and feel that each County will do forestry management in their own way. A state supported GIS system for County Forests is not where the state should be putting our money.

P. Dayton, Vernon Co.

118. Agree that it is important to maintain the services like the county liaison positions and working to make the grants programs more efficient. County assistance is critical to maintain healthy and productive County Forests.

G. Rebman, USDA-NRCS

119. I support the increase in flexibility for local county forests to manage their forests as they deem appropriate. However, I am concerned about the potential for landscape level planning concerns to interfere with, or preempt, local priorities. And to the extent that county forests are some of the most productive public lands, I am concerned that any reduction of support to county forests from the Division of Forestry could negatively impact their productivity.

S. Kariainen, Louisiana Pacific Corporation

120. It is clear that county forests provide extremely valuable benefits to the 29 counties having a forest by creating income and jobs at the local level. While the DNR has a strong partnership with the counties offering expertise in some areas, several statements within the document seem to reduce the value of the counties expertise to manage its own lands. The proposed change seems to suggest that DNR should play more of a role in consulting rather than hands on timber marking and management. Unless the DNR is willing to give the counties the funds equivalent to the 30 FTE's now provided in order to hire more county foresters, we disagree with this change because it will lead to less timber for sale in the market.

County forests are also some of the most productive and well managed forest in Wisconsin. If funds remain available, the counties should also have access to at least 50 to 75% of the monies attached to the Knowles-Nelson Stewardship land acquisition program. Because of their local level management capabilities and knowledge, counties would be more in tuned with the value of property thereby making purchases closer to the true value of the land purchase.

H. Schienbeck, Great Lakes Timber Professionals Association

121. In the County Forests section at the end of the first paragraph we suggest the following language be added regarding recreational opportunities on county forests: "In addition, county forests afford unique recreation opportunities due to their large forest blocks, extensive lakes and rivers, and remote nature. The demand for nature based recreation is increasing and county forests have the ability to prioritize locations that can sustainably provide opportunities." Similar language is found in the state forest section and we believe county forests are able to offer the same opportunities. In the County Forests section under Challenges and Opportunities we suggest additional text explaining in part the structure of the county forest program would be appropriate. In previous discussions with you regarding the significance of county forests to the State of Wisconsin we mentioned the protection afforded by state statutes preventing the "sell off" of county forest acres without a thorough review and significant public involvement. The second paragraph may offer an opportunity to illustrate this structure by referencing that process outlined in statute. We suggest adding language to the second paragraph; i.e. "However, there is a defined statutory process for withdrawing lands from county forests. State statutes help to ensure that county forests will remain viable and the investment by state taxpayers in county forests will be protected."

J. Severt, Wisconsin County Forests Association

CO-1

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)

DNR STAFF COMMENTS

122. Some Counties may have a hard time believing that the addition of Stewardship availability is a huge benefit at this time. Long term I think it is a great benefit. But currently, in a time when county boards are reducing spending, I know that a lot of counties are not going to be willing to take advantage of this benefit. Counties are doing many things to reduce spending, reducing board members, cancelling meetings, etc just to save a little money. Many counties are held to a 0 % increase in spending for the foreseeable future. During the short term, they may not view Stewardship as a large benefit since the County Boards are going to deny spending the other 50% since it would take money away from general fund.

...

I hope that the Counties are kept involved during this process to keep the good relationship in tact. Hopefully the proposed changes will allow enough benefits / enough flexibility so that it is a win / win for everyone. If a majority of the counties are not happy with the changes, the relationship could quickly deteriorate.

Division of Forestry staff

123. All the counties I work with take ownership over the management of their forests, and for the most part, the county foresters try their best to manage their forests in a sustainable way. Reducing DNR forestry time commitments to these counties is an obvious cost savings to the Division of Forestry.

Division of Forestry staff

124. Agree but still need to ensure that field checking of sustainability standards. Joint fieldwork will ensure strong relationships between DNR and county foresters as well as share opportunities.

...

It concerns me that two of our county forests are not certified sustainable. Why is this? Is the silviculture handbook still being followed on these properties?

Division of Forestry staff

125. Good move, but do more than a modest decrease in our time commitment to county lands. In many cases they are making quite a bit of money off of timber sales and we don't need to subsidize them with labor. Put more money into research, GIS, and other things that can help them and reduce our labor commitment to them.

Division of Forestry staff

126. Support for flexibility in selecting resource needs to manage county forests. Less support in modest reduction in time and or grants. In reference to grants such as CF loans and Variable acreage shares, instead of reducing the amount available there could be modifications made in the repayment rates to shorten the length of the loans, making funds available sooner for other county projects. Repayment rates could also be tied to specific counties and based on an average of their timber sale revenues setting a percentage of the loan to be repaid. Counties should still have access to the suite of DOF programs and expertise and still benefit from Nurseries.

Division of Forestry staff

127. I agree with this in principal but I believe the face-to-face time that is required by the time standards is essential in maintaining a strong working relationship with our county partners. Flexibility is good - but the division should not reduce the time that foresters/techs spend working with county staff to a point where our only role is regulatory (approving cutting notices) - because our regulatory ability is greatly enhanced by a strong working relationship. A reduction in variable acreage share loans should certainly be the first thing to consider reducing if we have reduced resources or need to come up with resources for the additional GIS/IT/Utilization & Marketing investments.

Division of Forestry staff

128. Agree. I like the intent of providing some flexibility to counties with respect to DNR services and support. However, I do feel that DNR needs to establish strong sideboards to the suite of services that may be selected amongst and how often any county can change their selections from the menu. We need to be particularly engaged in this selection. I would be concerned if a county decides to select as their main menu choice "DNR time" to run their timber sale establishment program when we have little time to give. This could have a sudden and adverse impact on work planning.

129. I also agree with the overall modest reduction in time and/or grants as counties continue to increase their revenue stream and become more self sufficient. However, I also recognize this will need to be further defined and delicately negotiated in order to maintain the strong partnerships currently in place.

Our DNR time should not be committed to performing technician level work for the counties. Currently, the time standards goals and worksheets result in just that. A maximum available time for fieldwork should be established and counties should be encouraged to hire their own field foresters as opposed to counting on ours to put up their allowable harvest. Our time should be shifted more towards coordination, property planning, integrated management and advanced level or other specialty niche work.

Division of Forestry staff

130. I like the idea of giving the counties some flexibility in selecting the types of assistance that best suit their situation. There should be a limit, however; on how much DNR staff time that can be converted to grants or other assistance. The partnership, especially of the liaison position with the county administrator, is what makes this program so strong. DNR needs to share in field work and maintain enough time to adequately oversee the program. I don't agree

with reducing the investment in the program because I feel the county forests are our most productive land base for landscape scale management given the amount of acres statewide and the large block nature of the forests. I would advocate maintaining our investment, at the least, in one of our core program areas and re-allocate monies from the urban forestry program.

Division of Forestry staff

131. The county forest\DNR partnership has long been built on sharing the workload. While it may be appropriate to reduce the boots on the ground in some counties, others depend on DNR personnel to accomplish work goals. In addition, it is important for DNR liaisons to know their county forest almost as well as the administrator in order to be able to offer advice on opportunities and avoiding potential problems. To gain that knowledge (and the confidence of county personnel) he\she needs to be in the field carrying out everyday forestry.

Division of Forestry staff

132. The counties should be providing their own staff for planning, reforestation, inventory and timber sale assistance, since they own the land and receive the timber sale revenues. The DNR input should be greatly reduced and the effort spent on state-owned land instead.

Division of Forestry staff

133. I think it should be noted that the position of DNR County Liaison Forester will be maintained.

Division of Forestry staff

134. I agree with this change, but I think we should better document hours provided to these support services on the time standard worksheet. A greater degree of flexibility provided to the counties in types and methods of service is prudent and could provide more tailored and efficient use of resources.

Division of Forestry staff

135. I am not in favor of reducing man-hours on the county forest. We have already set the minimum hours as the maximum and have in fact stopped working when these hours were met. The perception from our partners was what a screwed up agency the DNR is to stop working when in fact there was still more work to do. This would not happen in the private sector. Many of our partners believe we are a top heavy organization with a lot of dressing but no beef. We need to keep the boots on the ground with local personnel to make the best impact on the county forest and to represent the state in the most efficient way.

Division of Forestry staff

136. Agree with providing options that allow counties flexibility in determining how to best meet their specific forestry needs. Recommending a modest reduction in DNR investment is the only option that makes sense considering the numerous reductions the Division of Forestry will experience from an operational standpoint.

Division of Forestry staff

137. Forestry's role with the county forests should not become more of a regulatory role and less of a partnership. The system works as well as it does because the foresters that work with the counties work along side them as a guide as to how day to day forestry task should take place. As long as there is a strong partnership there will be cooperation and compliance. If the forestry role becomes less hands on, in the field, side by side work, the DNR will be looked as more of an enforcer not a partner. Compliance and cooperation will be lost. If county liaison's become more of a regulator they will loose their touch with the field work. And new foresters that enter into the department will not have had the opportunity to learn how proper silvicultural techniques are conducted.

An example of removing a partnership and turning it into a regulatory program is the private forestry section of forestry. New foresters don't have experience with sale establishment, field work, etc. Foresters removed from the field can't stay up with current practices that are applied to the field. The partnership between the landowner and the DNR forester are much removed. The partnership between private foresters and DNR foresters is regulatory. Cooperation and compliance are suffering.

Division of Forestry staff

138. It would be o.k. to reduce the investment in time a small amount instead of modest amount. I think it is important for DNR and County foresters and forest technicians to work in the field together on timber sale establishment, recon, administration, etc. Many times, issues are worked out on the ground (in the woods). It is o.k. to provide flexibility, but I don't think we want to make DNR's role a regulatory one.

Division of Forestry staff

139. I agree flexibility is good but the counties already get the services discussed, such as IT, and GIS. I don't see that there is much of an offer here to the counties.

I believe we should continue to maintain DNR liaison foresters to work with the counties. We have a great partnership and our foresters provide many valuable contributions to the program.

We should look to reduce investments in grants and support to salary/benefits. As our budgets continue to be strained all our partners receiving monetary support should expect to share the pain as well.

Division of Forestry staff

140. To maintain public trust and support the Department needs to have a presence at local levels. We need to maintain a face, a local go-to person that taxpayers and local governments can identify with. Given the variation in County Forest size, staffing, budgets and technological capabilities, providing them a suite of options with a budget ceiling makes sense. That said, we better be careful not to displace the DNR liaison role with "consulting services" and pull back to becoming exclusively a "funder". The significance of the County Forest resource more than justifies the important conduit of the County Forest Liaison role.

Division of Forestry staff

141. I feel that the proposed shift is understandable and a good method of business as long as we receive honest input directly from the County Administrators on how they feel our role should be. Each County has different needs, and so overall it would be good to respond to the varying level of needs each county has.

Division of Forestry staff

142. Will the reduction in grants mentioned in CO-1 impact the counties abilities to manage for wildlife and rare species? Virtually all of the biotic inventory work conducted on county forest lands in recent years was done through grants. Unfortunately, biotic inventory information is sparse for the majority of the counties, so any opportunity to collect biotic inventory information would be very helpful to both the counties and the department.

DNR staff (non-Forestry)

143. Disagree. If WI DNR field staff can not get support services from GIS, IT, and other support services in a timely fashion how are the County Forest personnel going to get these services? Our local RIMS representative seems to be "running" constantly trying to cover all the needs for his area. A few questions: Do the local counties' have support services for their County Forest personnel? I thought there is a greater need for field forestry work rather than support services for the County Forests?

Division of Forestry staff

PUBLIC COMMENTS

144. We are generally supportive of the Division of Forestry's proposed directions for county forests. The infusion of greater flexibility for counties appears to be a positive direction; Wisconsin counties with forests are different not merely in size, topography and forest type, but in their goals, needs and management assets. The state-county partnership is beneficial, and providing greater opportunities for counties to tailor their interface with the state should be a win-win situation. Additionally, strategic acquisitions by the counties, to the extent they are affordable and prudent, are supported by the Paper Council.

E. Gustafson, Wis. Paper Council

145. The partnership between the DNR and Wisconsin's County Forests has a rich history and has earned significant national reputation. County Forests provide many valuable and irreplaceable benefits to not only citizens but the economy

of our state. The DNR should continue to culture this partnership and not drive perceived “wedges” between the DNR and the County Forests. The strength and recognition of the County Forest program has as much to offer back to the DNR as what the DNR invests. I agree that exploration of more flexibility should be considered with full participation from WCFA in proposing and working through future shifts of resources invested in Wisconsin’s 29 county forests. Maintaining a liaison forester and investing DNR time in field efforts to help manage this 2.4 million acre resource are critical. The field work on County Forests provides much needed firsthand experience on the practice of sustainable forestry. Shifts of resources must be mutually agreeable and not be perceived by the county forests as a continuation of the erosion of DNR interest or willingness to invest in providing the benefits enjoyed through all segments of Wisconsin’s economic, social, and ecological fabric.

146. This partnership has clear definition in state statutes and demands high priority by the DNR.

M. Luedeke

147. I do not agree with the “Proposed Change”. The County Forests need DNR people on the ground helping as they have been. Counties I’m familiar with have the GIS, IT, and consultative services they have needed available to them. Forestry is an on-the-ground profession. That’s where you need the help to get it right. That’s where the help should continue to be for counties.

N. Paulson

148. WWOA believes that the county forest system is mature enough for the Division to shift its assistance and support service. WWOA is aware that counties receive substantial income from county forests and therefore realize the long term financial gain from their management.

L Hanson, WWOA,

149. I find it difficult to comment on this draft due to the nearly complete lack of information. I am eager, as I am sure is every County, to read the details regarding the modest reduction in time and/or grants, as well as the particulars defining a greater degree of flexibility.

Also, I don’t feel there is a need for an increase in IT or GIS assistance (the core programs, WisFIRS, Raven, etc, are proprietary and, as such, inherently require a basic level of DNR assistance). In general, counties do not need an increase in assistance from Madison, they need it in the field.

The supplemental pie chart is also very difficult to comment on. Based on the information provided within the chart, the proportion of the overall budget allocated to the County Forest program would be reduced by 1% (and I’m sure by much more as the actual budget is developed). Again, I would be very interested in how these changes were ascertained. Why the 1% reductions in County Forests, Private Lands, Fire and Nurseries? Why the 1% increases in State Lands, Services and Tools, Utilization and Marketing and Urban Forests? At face value, it appears to be a move from field level assistance to office/Madison assistance. Again, not a high priority for County Forests.

J. Bodine, Forest Administrator, Bayfield, Co.

150. I fully support this proposal and think it is long overdue. The 29 county forests are very different and have very different needs. The time standards were a good attempt at trying to equalize the difference in county forests but it had some problems and was not always used as intended. I think DNR liaisons need to become more of a liaison and less of an extra field person for county staff.

My one concern with this proposal is the statement “modestly reduce the investment in time and/or grants”. I think the reduction in investment needs to be significant but phased in over a period of time. I suggest that the reduction in investment in county forests needs to go to help develop support services especially in IT and GIS (WisFIRS) that will ultimately benefit many programs including the county forests.

One area that I think the DNR needs to continue to focus on with the county forests is certification.

While the county forests will not like a decrease in investment they are one of the few entities that you deal with that have the ability to continue to sustainably manage their forests with the programs and personnel that they currently have in place.

T. Mulhern Forestry

151. On January 6 we also discussed the reality of tradeoffs, the state taking credit for offered programs that in the past may have been taken for granted; i.e. IT and GIS. Hopefully the counties will benefit from the 1% increase in services and tools shown on the Division of Forestry Investments illustration, but there are some members of our organization that remain doubtful this will happen. There is also some concern regarding the use of access to the state's portion of the Knowles-Nelson Stewardship Program as a tradeoff in the event of lost services in other areas.

J. Severt, Wisconsin County Forests Association

FIRE PROTECTION (FP)

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.

DNR STAFF COMMENTS

152. I think this has been well thought out. Interesting to see how it will play out over time.

Division of Forestry staff

153. Yikes, to start moving equipment to coop areas is ridiculous, especially if we are moving from landscape 9 or a 10. That is why we have equipment in the woods...fires are not easy to get to. Southern Wisconsin are coop areas for historical reasons and I suspect not because of potentially huge fires. Of course they have them but that is why more Fire departments are located there. Hire private operators.

Division of Forestry staff

154. Agree with many of the concepts except for 2 of the programs that it is recommended to maintain. Those being investment with fire departments and funding training. We have put additional responsibilities on fire departments and they are now starting to feel the strain to the point they are realizing it is too much to place on a volunteer organization. If this continues to be the direction we want to go both an increase in funding and training should be considered. Dollars for support can possibly come from the SEAT reduction. A liaison role similar to the County Forest program could be considered.

Division of Forestry staff

155. Overall supportive of the direction and the concepts identified in the direction. There is some concern in implementation of some of the proposed changes however.

Division of Forestry staff

156. Agree with our role: Agree with proposed changes using fire landscapes, Prevention/WUI, SEAT elimination, training funding level, fire safety and LE. Disagree with shifting resources to coop (from fire landscape 10).

Division of Forestry staff

157. I agreed with all the items listed under the Fire Program and appreciate that it mirrors the Fire Program Assessment.

Division of Forestry staff

158. I have an issue with the initial statement of the role of forestry. The second sentence says that the DNR complements the local fire departments and communities. This sounds like the way they do it in Texas which is much poorer and inefficient than our current program. It sounds like the wildfire is left to the local FD's and if needed we would come and help. Mr. Marty says this is not the case and our present fire philosophy would continue. This is also how he presented it at the statewide meetings. The statement should be changed if we are continuing with our present philosophy.

Division of Forestry staff

159. FP role I think there is some potential to meet some of the needs in private forestry by better integration of many Division employees from the top down to forester rangers and forestry tech's.

Division of Forestry staff

160. Agree with all intent statements.

Division of Forestry staff

161. In general, I believe we have one of the finest forest protection programs in the country. Something we can all be proud of. That said, if budget cuts become an issue, we probably will need to make substantial cuts in this program, because of its large proportion of our budgeted resources. This could be a tough pill to swallow given the many dedicated and passionate employees that provide excellent service in our fire program.

Division of Forestry staff

162. I agree the Division is well integrated which produces many efficiencies. For example we mark timber near the road while on fire duty.

Division of Forestry staff

163. I like the idea of the fire landscape model, and hopefully it will result in a more effective allocation of our fire resources.

I would like to see more strategy on the direction of our coop fire program. The draft calls for increased investment in high fire areas, but will the program still be very minimal in the low risk areas or will we bring back components of the past program. Will we follow fire study recs? Will coop be an organized part of our program or just an add-on?

Division of Forestry staff

164. As a general statement regarding Fire Protection it seems that these valuable fire protection resources (personnel and equipment) are not available for other forest management duties. The division must be more integrated. Personnel and resources must be expected to work all aspects of forestry. I understand integration is no new idea however it is still a relevant issue. Although you will hear arguments from both sides, no one job is more important than the other.

Division of Forestry staff

165. In the Fire Program, the use of fire program personnel in regards to their contribution to forestry management activities remains grossly inconsistent across the state. For instance, why do Forester/Rangers in the highest risk landscapes in the northwestern and northeastern portions of the state make significant contributions to meeting forest management goals, while Forester/Rangers located in similar risk landscapes in central Wisconsin provide almost no contributions for accomplishing forest management goals?

Division of Forestry staff

166. I agree with this proposal.

Division of Forestry staff

167. The discussion of western fire details was not addressed in this document, however I think it would be in the division's interest to show solid support for staff to assist with western (out-of-state) fire assignments. The value of these assignments includes; keeping fire qualifications legitimately current, stepping outside "the box" to experience how other organizations approach similar situations and it provides budget savings. Moving towards Wisconsin-ized standards and preparing only for "typical" Wisconsin fire situations would be a step backwards. Admittedly, staff appreciate the pay bump, but what some people fail to acknowledge is that the assignments provide intense/ focused experiences that keep professionals sharp on current tactics and help develop better communications between firefighters around the state that training exercise simply cannot provide. It also seems that every year that we have dispatched people the nation is hot into the season before we get the go-ahead from Madison. It's about time that Madison supports the field and promotes the on the job-training and firefighter skill enhancement that out of state fire details (for firefighters and overhead staff) provide. The argument that we have priority work at home is somewhat valid, but if training and budgets are also high priority, then I think not meeting certain in state goals is legitimate and can be defended by management.

LeMay Center is designing and building trucks to fit the bill for western type engines, yet we don't have a commitment to use them as such. The trend seems to be building initial attack engines that are Federally Typed, and more than we need for 90% of the fires in WI, yet they are not being promoted as out-of-state ready. If there is not a commitment to western availability for the trucks, scale them back to smaller, maneuverable, forestry work vehicles, more affordable multiuse forestry work vehicles.

Division of Forestry staff

168. I'm talking about the support we get from our mechanics...and more specifically Mike Wallace's position at the Spooner Shop. Even though Mike is not under the Division of Forestry, he is a great asset to our program. Any time we need our equipment fixed he is there to help (day, night, or weekends). This is critical to our program, especially during Spring fire season. We just wouldn't get that same support with "vended maintenance". There is talk that when Mike retires that the position may not be filled and the shop will close. That would be a great disservice to us as forestry employees and the public who's lives, property, and resource we are charged with protecting. Maintaining the mechanical support we need is of the utmost importance to our program and certainly deserves some discussion.

Division of Forestry staff

169. The sections on Fire Protection and Forest Health were very good, but there is no mention of prescribed fire in these or any other part of the document. I'd encourage Forestry to look more closely at the applications of prescribed fire in both of these categories, as well as in silviculture.

Division of Forestry staff

170. The BWM agrees with the direction outline in FP-1 and FP-2. The BWM is more than willing to help support a more strategic approach to fire protection. We'd encourage the Division of Forestry to apply more integrated ecological approaches to fire protection and management. For instance, we'd encourage utilizing forest types less prone to catastrophic fires (i.e. natural jack pine – barrens) in or around the wildland-urban interface.

The BWM encourages more positive discussion on the role of fire in ecological processes as you move forward on strengthening existing outreach and educational programs. The BWM is moving forward on its own statewide educational strategy and we'd welcome the opportunity to collaborate on these types of messages.

DNR staff (non-Forestry)

171. The Division intends to use its new 2010 Fire Landscape Map to reallocate resources; the map illustrates fire risk by region, emphasizing the higher risk levels found on our state's sandier regions (e.g., Central Sand Plains, Northwest and Northeast Sands).

Will this impact the ability to conduct prescribed burns in these regions, or conversely, outside of these high-risk regions where fire suppression resources may be decreased?

How will this reduced investment in lower-risk areas affect underlying Forest Strategy 14, "Encourage the use of disturbance mechanisms to maintain diverse forest communities," which addresses the impact that lack of fire has had on several forest types. In our region Strategy 14 directly supports Strategy 11, "Encourage the management of under-represented forest communities," specifically the oak forest systems.

Division of Forestry staff

172. All the proposals for this section sound or appear like they are proposal changes to this part of the DOF, but are they really? I interpret these proposal changes as being a way to state how things are currently being done or are in place for this part of the DOF in a different way. In other words using semantics!

Division of Forestry staff

PUBLIC COMMENTS

173. Considering the extensive mix of residential development in the forests of Wisconsin, it is difficult to include the "allow to burn" option when approaching fires in Wisconsin. However, for that not to even be addressed suggests that the "Strategic Direction" is lacking of a full consideration of the issues of modern forestry.

We now know that fire is an essential part of the forest, and while western forests have been more damaged by excessive fire suppression than have the Great Lakes forests, there is no question that the almost total suppression of fire in Wisconsin since the great post-logging fires has created a significantly changed forest. Is this the forest that we want? To what extent it is important to allow fire to be a part of the forest ecology of Wisconsin? I am not suggesting the answers

to these questions, nor that the proper answers would lead to different state policies. But not addressing them is a shortcoming of the "Strategic Direction."

C. Forbes, Summer Resident/Landowner

174. Proposals seem reasonable.

P. Dayton, Vernon Co.

175. Agree with the roles and changes proposed.

G. Rebman, USDA-NRCS

176. Wisconsin has a very short wildfire season, fires that do not last long, and not a lot of fires that cause significant damage. There are places where the risk of a large destructive fire is present on the right days. That's where the concentration of fire resources should be stationed. Because the fire season is short it is important to use the fire suppression personnel on other important work during the rest of the time. Hopefully your analysis has carefully considered the fire hazardous and non-hazardous areas and will be able to make the appropriate staffing and equipment adjustments.

N. Paulson

177. Wisconsin historically has done an excellent job of preventing and suppressing fire. Much of that success can be attributed to the long standing partnership with local fire departments.

L Hanson, WWOA,

178. "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."

The FDAC would like to reiterate that the forest fire protection activities across the state are based on a long standing, effective and efficient partnership. This Division of Forestry/ Fire Department partnership is based on the common cause outlined above. The FDAC feels that each partner compliments the other in the wildland fire protection arena. The Division provides important fire protection support to local communities by filling roles (e.g. wildland fire experts, IMTs, specialized heavy equipment, etc) that are not efficiently covered by fire departments. On the other hand, fire departments compliment 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. The FDAC would like to see language recognizing this shared endeavor with fire departments more clearly articulated in the Division's role statement.

The FDAC would be remiss if we did not point out that the Division's role is furthermore based on statutory obligation. State Statutes clearly articulate that the Division's role is to affect forest fire protection in Wisconsin. Fire departments stand ready as partners in those efforts.

The FDAC would entertain further discussion or clarifications of this document at anytime. We appreciate that the Division values our contributions and opinions.

On that note, there are several topics which the FDAC would like to comment on outside of the Strategic Direction document.

The FDAC would like the support of the Division on the proposed increases in the rates paid to fire departments for equipment and manpower used in wildland fire suppression. These rate increases were initially proposed by the FDAC in 2006. Five years have passed and the proposal maybe obsolete before they are enacted.

Both the Division and fire departments must respond to initial attack fires. Fire departments are not interested in assuming all of the roles necessary on a wild land fire response. As the FDAC has stated in the past through the Fire

Program Assessment, FD cafés, Comments on Workload Reduction documents and discussions with the Division at all levels, a shared response is needed! Excess resources can be cancelled or released from the wild land fire response. Again, a partnership by definition means shared efforts. The fire departments bring skills and equipment to the fire, the Division brings other skills, equipment and authority to the fire.

Lastly, partnerships are 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 wild land fires without such relationships is unrealistic. Allow those relationships to be built and nurtured. Our partnership is strong, now is the time to support it despite the current economic climate.

Obviously, the FDAC desires to continue to build on the successes of the current partnership with the Division on wild land fires. We feel that we need each other in all of these efforts. Any retraction of effort from either party will hurt the effectiveness, efficiency and safety of both parties. Neither agency is alone in the complex, dynamic environment of wildland fire. Each needs the other to be successful and safe in protecting the lives, property and natural resources of the citizens of Wisconsin.

Fire Dept. Advisory Council

179. I was pleased to see mention of the importance of working with local fire departments (FDs) in fire prevention and wildland fire suppression efforts. I agree that, with proper training and cooperative relationships between DNR staff and FDs, they can play a huge role in effective wildlife fire suppression.

This became very apparent to me while I was the Area Forestry Supervisor at Brule, where I was able to observe the excellent relationships that DNR fire staff in Douglas and Bayfield Counties had developed with the local fire departments there. There were several instances I remember where some of these FDs responded to fires that started in very high hazard areas, during spring fire seasons, and were able to suppress them before they became major disasters. The performance of the FD members during mock fire exercises also convinced me that they would be able to make very significant contribution to fire suppression efforts, if a major fire occurred.

The key issue to keep in mind when dealing with local fire departments is that developing and maintaining effective working relationships with FDs requires a high level of social and "people" skills. Any Ranger that works with a fire department must remember that patience, diplomacy, and a good measure of humility will go a long way in lowering levels of resistance and accomplishing an effective working relationship. Persons who join volunteer FDs do so for a wide reasons, often develop some degree of "turf issues" with county, state, and even federal involvement in their department, and it is not uncommon to find department members who have a strong dislike for DNR (A department chief who a Conservation Warden just pinched for over-bagging ducks can have a rather dim view of the entire DNR staff).

To make a long story short, it would be very helpful to give all new DNR Foresters-Rangers that are expected to work with fire departments a good orientation about the complex personal relationship issues that they might encounter, as well as training in social skills that they can use for addressing those issues.

T. Salzmann, Sandhill Land Services, LLC

180. You heard many of the counties' concerns regarding the Fire Protection portion of the document at our January 6th meeting. Many of those concerns center on the lack of flexibility among some DNR staff. We will wait for the implementation phase of the strategic direction to provide further input on this issue.

J. Severt, Wisconsin County Forests Association

FP-1

<p>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)</p>
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DNR STAFF COMMENTS

181. "Efficiencies", this should not mean the continued tweaking of the program to try and close every loophole in the program. The program each year has moved farther away from the goal of the 3 E's and continually has recommendations for change. None of these have to do with efficiencies and at this time may be impossible to develop and implement anything that would make PF-1 possible. I would prefer a phase out and work with partners to find a new program that meets mission goals into the future.

Division of Forestry staff

182. I find many flaws with the fire assessment including the failure to take past fire occurrence into consideration, failure to look at investments such as Christmas trees plantations and ginseng gardens and their affects of fire potential and the values at risk. Because the study is incomplete I cannot support the reallocation of resources based on the results.

I also find that the argument to reallocate resources from recognized protection areas to co-op lack sufficient data to substantiate the move. There is a process where fire municipalities can become areas of protection. There is also a process where Fire Departments can get assistance on a going incident in the coop areas, why reinvent our program when the values at risk are equal and the potential for large fire is in many ways lower. Further, the coop communities have made investments in FD capabilities based on the knowledge that they are not in DNR protection but communities in areas of protection that would loose resources did not have that chance. I believe it is a bit of empire building in the co-op and the case to expand our presence there has not been made. Perhaps a better use of resources would be to revisit the coop fire officer duties for those rangers adjacent to co-op areas rather that reallocate resources from areas with a long history of working cooperatively with the DNR and have made decisions on their operations based on a reliance that we would be there at our current capabilities.

183. I would suggest we re-do the fire study. Re visit the need to expand our presence in the co-op and investigate whether there are better, more efficient and less disruptive avenues available to use to meet our program responsibilities.

Division of Forestry staff

184. Support for the fire landscape concept.

Division of Forestry staff

185. I am glad to read that the fire assessment recommendations were accepted as I believe the landscape risk modeling is great work. Much of my area will remain at a similar investment level in regards to fire management due to its association with landscape 15 (the highest risk level in the state). However, in other landscapes, I think we need to carefully look at re-allocating resources to other areas in that many of those positions have a full suite of forestry duties tied to them along with their fire management work. Also our fire department partners have stated that they do not want the whole burden of wild land fire on their shoulders. We may not be able to shift resources (heavy units) out of some of our intensive forest protection areas to the COOP areas until we work out the details on how to handle the fire management and forest management duties of those traditional stations as well as the impacts to the local fire departments.

Division of Forestry staff

186. I have concerns about how this proposal will be implemented. Yes, we need to look at our program by risk, but I do not think we need to permanently re-assign heavy units to accomplish this. Even though some heavy units may not be in the highest risk areas, they are very important because the local fire departments do not have the wild land equipment to deal with fires that heavy units are so effective at. Re-assignment would be expensive (building new warm storage buildings at \$\$\$). Rather than permanently move and concentrate equipment and people, use better planning and pre-positioning as risk and fire weather dictate. There is much improvement we can do in working together across Area and District boundaries sharing equipment and being nimble before we go to the drastic step of re-assigning heavy units.

Division of Forestry staff

187. Agree. Fire landscapes are the way to go. However, we also need to recognize that such landscapes do not follow defined county or other political boundaries that many of our programs have been built upon over many years. We need to continue to recognize and support local needs, obligations and commitments whenever possible. Higher hazard

landscapes that require more fire resources may not always have as complex a forest management program as do some lower hazard landscapes. Consider seasonal allocation of resources instead of permanent placement of FTE in the highest hazard landscapes when needed for a single purpose, such as fire management.

Division of Forestry staff

188. I agree with the concept of allocating resources based upon fire landscapes and to implement the recommendations from the fire assessment.

Division of Forestry staff

189. I really like your approach to fire landscapes in FP-1 - seems visionary.

Division of Forestry staff

190. Allocation of resources based on fire landscapes is an effective and nonbiased way to allocate resources. It should serve us well.

Division of Forestry staff

191. Disagree FP-1, FP-2 & FP-3 The fire landscapes are flawed as they do not reflect the understory types (explosive balsam fir here in Iron Co). They also do not take into account the remote blocks of timber in the north and the difficult access for large FD trucks. Also there are fewer volunteer fire fighters in the north (few departments meet standards) and they live and work further from the station. "Block House Lake" fire is an example of the difficulty of protecting structures along highly developed lake fronts.

Division of Forestry staff

192. WUI activities can be implemented without increasing our investment. We currently have the staff with the time and ability to accomplish this work. High risk fire areas already have the greatest concentrations of Division of Forestry staff, generally with under-employed personnel due to the lack of traditional forest management responsibilities to complement their fire control duties.

...

The Strategic Direction does not take into account the savings that could be made if the most efficient methods were recognized, embraced, and then employed by all teams statewide. The way the Division accomplishes similar goals and objectives varies across the state. Some teams and methods are much more efficient than others, and those methods should be implemented to provide cost savings and program consistency.

Division of Forestry staff

193. Fire landscapes appear to be a good tool to determine appropriate allocation of resources. Some landscape lines may need further evaluation, but since this documentation doesn't consider specific recommendations I would assume that further discussions will occur prior to operational implementation of reductions or additions of equipment and personal. It will be important to consider all aspects of forestry that are associated with both equipment and personal when considering equipment and personal reductions/reassignments. FP-3 directly addresses this from a broad standpoint. I would assume that AFL's will play an important role in determining the operational aspects of addressing resource shifting so it will be important that field staff are in the loop on those decisions, whether staff agree or disagree. More specifically it might make sense to pre-position or temporarily move resources based on risk and specific forest fire danger that potentially exists in given areas at a specific time. This would allow for appropriate resource utilization based on risk and existing potential from a fire danger standpoint yet allow adequate staffing the remainder of the year to accomplish the entire gamut of activities that forestry personal are involved with at a landscape level.

Division of Forestry staff

194. In addition to the use of fire landscapes to determine the location of resources and analysis of the local fire departments, their resources, and personal (volunteer vs. paid) within a response unit.

It seems as though the incident command system is very effective in stopping and controlling wild fires. The price tag on equipment, response, and time to control fires that are burning in wetlands, bogs, swamps etc. shall be reevaluated. Fire suppression is expensive especially when no life safety or personal resources are at risk. There is low risk in these wetland fires but a high price tag.

Division of Forestry staff

195. I also think the allocation of resources for individual fires need to be addressed. For example, why are we wasting resources on a fire in a bog next to open water where no structures are threatened. In one situation, the piece of equipment used sunk in a bog. This led to unnecessary costs to get equipment out, while doing damage to the natural resource. It also makes the DNR look incompetent to the public driving by. Fire control needs to use common sense on some of these so called “fires” they are called on. Not every fire needs to be treated as a catastrophic forest fire.

Division of Forestry staff

196. FP-1, FP3..... I believe the fire landscape is a very good concept and agree with utilizing it. However, I have some concerns on the risk factors developed and the inconsistencies in their use. Both fire landscape 6 & 10 fell below the threshold (Risk Factor of 30) as it relates to risk that we determined we would no longer provide initial attack resources. However, for some reason fire landscape 6 is not identified for resource reductions even though when you look at fire department resources in landscape 6 it would appear the fire departments are better prepared to take on the task of initial attack on wildland fires when compared to landscape 10.

197. I am not entirely apposed to the concept of resource reductions but I think fire occurrence should have been considered when developing the risk factors. Looking at fire occurrence and the agencies currently providing initial attack on fires may reveal other areas in organized protection where equipment can be reduced.

Division of Forestry staff

198. I think using Fire Landscapes is a good idea and it will help shape our resource configuration in the best methodology we have available to us right now for use in the future.

Division of Forestry staff

199. FP1,2 The discussion mentions that investment will be increased in high risk COOP areas, but the recommendation goes on to say that the Division’s investment will be reduced in lower risk areas. Are these COOP areas going to be funded at levels comparable to the “lower risk” areas that are planning to be reduced?

Thinking big picture, I think a thorough evaluation of the coop and DNR protection areas should be conducted (the protection areas should be re-evaluated over time). It may be appropriate that some COOP areas be identified as good candidates to be designated as DNR Protection and that some other areas maybe are not appropriate to remain under DNR protection. I know that this topic was not addressed in any detail due to the urgency of the Fire Assessment. This should be done over a period of time that can adequately evaluate the true needs of an area and to help fire control focus on the areas of highest risk.

Although I hesitate to suggest another differentiated level be established, I think it may be appropriate to differentiate between COOP areas that are not likely to be assisted and areas that DNR “regularly” offers some level of assistance. I think it would add some clarity in the COOP areas (and COOP program) and could help focus the planning on areas that could likely use DNR assistance. Maybe this is being done behind the scenes already. It could also firm up how many COOP acres the DNR is regularly offering technical and/ or on the ground assistance.

Division of Forestry staff

PUBLIC COMMENTS

200. (FP 1,2,4) The proposals for the Fire Protection program are supported by the Paper Council. The focus on hazard assessment (FP-1) and increasing attention to the Wildland-Urban interface (FP-2) appear logical. So, too, is the change to discontinue exclusive use contracts for the single engine air tankers (SEATs) program, while maintaining relationships with the Great Lakes Forest Fire Compact and federal agencies (FP-4).

The Paper Council urges that contingency planning be part of the fire protection program to assure that the other routine, day-to-day – but important – non-fire related responsibilities of the Division of Forestry are accomplished during the most challenging fire years. While the challenges of fire suppression are exhausting for individuals and agencies, contingencies need to be in-place to assure the challenges do not result in other responsibilities languishing or falling unmet.

E. Gustafson, Wis. Paper Council

201. Cautiously agree to allow fire landscapes to be used as a resource allocation tool but concerned that internal and external political influences will impact allocation of resources beyond what the fire landscape tool would suggest. I'm also concerned that there exists an undercurrent to bolster resources in areas of Wisconsin where no DNR suppression resources are currently stationed and reduce resources in intensive and extensive areas where they have been relied upon for many years. This reduction shifts the burden onto local municipalities, especially rural volunteer fire departments, which are already struggling to maintain firefighters and adequate funding. If there is a developing need for additional forest fire suppression resources in these "Coop" areas, then additional new investments should be made and do not diminish what has been invested/committed in the intensive and extensive areas for the last 50-75 years.

M. Luedeke

202. Agree. This is how it is supposed to be done.

N. Paulson

203. We particularly agree with FP-1 which relies on data on high risk areas and with FP-5 and FP-6 which places emphasis on fire fighting readiness.

L Hanson, WWOA

204. "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. "

The FDAC understands the use of fire landscapes to identify forest fire risks in a more general and new way throughout the state. The FDAC furthermore accepts that certain fire landscapes by definition require different levels of investment to effectively deal with the fire risk.

Fire Dept. Advisory Council

FP-2

<p>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)</p>
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DNR STAFF COMMENTS

205. Support for the reallocation of resources to strengthen the prevention and WUI program. Prevention should be a focused message and delivered with an appropriate time commitment for individual landscapes based on Risk.

Division of Forestry staff

206. I completely support WUI increase and prevention based on actual occurrence, rather than just Smokey Bear school programs.

Division of Forestry staff

207. The statement is that we will strengthen highly-effective programs such as the WUI program. While I support the WUI program, I would question the statement "highly –effective". I along with many rangers and fire staff over time have committed time and effort into educating landowners and groups. We have done 1000's of home inspections. The changes on the ground have always been marginal. The present group of WUI folks are getting the same results, except that they have money to hand out to do town and community projects. This makes it look like a great deal is getting done. As long as the program is getting funded externally I think we should continue the effort in landowner education. I would not sacrifice any state funded wildland firefighters, forestry positions or resources for this program. Fire prevention should be strengthened, and can be done quite easily through the field as it is done now or in the past.

...

Despite the new governor's thoughts, the division of forestry was not set up to provide a program to give consultants a job. The good consultants have all the work they can handle. DNR foresters must remain very involved with all aspects of the tax law programs that we have been tasked with administering. We can not consistently, effectively and efficiently manage the program if we continually lose touch with our landowners. We are confusing our landowners when they are

jumping from consultant to consultant to logger. The increase in consultant help has dropped the quality and consistency that we offer our customers.

Division of Forestry staff

208. Our prevention efforts each year need to be more focused and targeted to a specific message.

Division of Forestry staff

209. Agree. Fire prevention and WUI programs should be combined and integrated into one. Rather than having single purpose FTE's assigned to this work, such duties should be added to the job descriptions of regional employees currently in the workforce. Analysis of prevention/education needs should be conducted on a statewide basis with priorities determined and work integrated into existing work plans. Consider reallocating some time from existing state forest planner positions to develop community wildfire protection plans instead of farming these out.

Division of Forestry staff

210. In the body of this section it talks about the potential for alternative scheduling (e.g. 7-day scheduling). I do not agree with this concept and believe we need to continue to operate as we are.

Division of Forestry staff

211. Who or how was the term "highly effective" prevention and mitigation programs defined? To my knowledge, a study of our WUI program has never been done to determine whether it is effective or not. I agree with rolling the fire prevention program into a Division wide strategic education and outreach plan. The Fire Program Assessment recommended allotting 2 FTE's worth of time to the WUI program. I would strongly encourage the first option to be contracting the WUI work out. I believe fire departments, local units of government, contractors, etc would welcome the opportunity for this work. Since WUI money is tied to federal grant money, this option would make it easier to reduce this work if the federal money is eliminated.

Division of Forestry staff

212. Locally (Per work reductions from Madison) we are being directed to do less fire prevention and not given the time or resources to do an effective job in the field.

Division of Forestry staff

213. I don't think we need to increase the WUI program especially if it means adding additional employees. It is a well known fact that many areas (West Central) in the state have fire control staff now that are not gainfully employed in forest management activities year around. Seems that I hear that one Forest Ranger in one area had only 9 hours and one had 35 hours of forest management for the year and many others were not close to 100 hours. (Do we really need foresters in these position?) Many Rangers and techs in the North get that many hours in forest management during the fire season! I haven't heard the hours for techs but I think it would be safe to assume that they would be similar. Keep the WUI program in the hands of local Rangers and staff unless outside assistance is justified and any many areas it is not. We do not need to be creating more jobs and expense at this time.

Division of Forestry staff

214. Wildfire prevention has taken some big steps forward in the past decade and with advancements in technology I personally believe our fire prevention program is much more effective than it was two decades ago. The burning permit system is just one example of such advances. I strongly agree DNR should continue to invest in effective prevention programs that target not only those in Wildland-Urban interface situations but the public in general. Although it is difficult to quantify the effectiveness of youth programs I strongly believe we need to maintain some type of prevention program geared toward our youth audience.

Division of Forestry staff

215. If we are serious about preventing forest fires and the damage they cause, we would enact a black-out period from the time that things 'get dry' until green-up, regardless of the weather on a particular day (it's raining). Of all the things that the public has been inconvenienced by, this is hardly an item that will cause them to 'take to the streets' and cause a wild uproar. At least one neighboring state does this and rumor has it that it's effective. I'd like to trust our leadership to look into methods that are 'outside the box'. If we put more effort into black-out periods, we may not need to spend more time on suppression and the public will suffer fewer losses.

Division of Forestry staff

216. I agree with strengthening the prevention and mitigation program of the fire program. It seems like a good role for the Forest Rangers and Forestry Technicians to pick up during the 9 months that aren't dealing with fire suppression. Rangers and technicians are passionate about fighting fires and educating others about the dangers of fires in the urban interface. Their role should be aimed at prevention and mitigation. Mapping of high fire danger areas, noting home/cottage owners that should do mitigation, and response techniques.

Division of Forestry staff

217. I think these programs could be contracted out with local fire departments.

Division of Forestry staff

218. Seems like a push to lobby for legislation to ban the main cause of "wildland" fires debris burning—burning barrels may ultimately be more helpful. It would be a lot better for air quality too and not just in areas that are considered fire hazards---people rarely only burn paper products etc...

Division of Forestry staff

219. I have not worked with the WUI staff/program due to my team being more associated with hardwood stations. I am sure they provide benefits, but there should be some evaluation of those benefits. From my perspective these positions are a luxury and if the funding runs out we need to evaluate other options to get the job done before we take positions from other areas to meet the need. Perhaps we can meet the needs by utilizing other forestry FTEs within these areas with high risk fuels. Forestry techs may be good for this job? Also, perhaps these tasks can be contracted out to local FDs, insurance companies?

Our forestry techs are typically, from my perspective, the group of FTEs that seem to be under employed. (I know this is a broad generalization and not true for all) There are a few reasons for this, 1 - many of them were hired as fire control staff and their forest management skills may be lacking. 2 - Their willingness to learn may be lacking. 3 – they feel forestry work is for the foresters. 4 - In many cases, supervisors struggle to overcome 1,2,&3. I feel there has been improvement, but we have a ways to go. I hope as we look at efficiencies in the operational phase of the strategic direction we take a close look at the work being completed by our techs and how to best utilize these folks.

Division of Forestry staff

220. I believe we can use Rangers, Techs and Forest Protection Specialists in the Central Office to take on the drive to get more proactive in WUI and prevention activities. This is certainly an area that overdue attention should be paid.

Division of Forestry staff

PUBLIC COMMENTS

221. This is too non-specific to be evaluated. I have not seen an effective DNR fire prevention program on the ground compared to some I've seen in other parts of the country.

N. Paulson

222. "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."

The FDAC supports the strengthening of the highly effective prevention and automated burning permit programs. The FDAC recognizes the value of these efforts with the increase level of public awareness of all fire related issues.

Furthermore, the FDAC supports the expansion of forest fire prevention themes into fire department school program efforts. In a recent fire department survey, 85% of WI fire departments were conducting school programs and expressed interest in forwarding wildland fire prevention messages to this important audience. The necessary support through prevention themes, scripts, ideas and supplies from the Division are all that is needed to share this efficient effort.

Lastly, the FDAC remains concerned about an increase investment in the WUI program. The FDAC is supportive of efforts to educate landowners on forest fire issues through FIREWISE programs. The FDAC is anxious about the high cost in monies and resources on Community Wildfire Protection Plans (CWPPs). The large investments in CWPPs are better spent elsewhere (fire suppression, prevention, etc) if local towns and fire departments don't have ownership in these efforts up front.

Fire Dept. Advisory Council

223. I support prevention and mitigation programs but also realize that the best form of prevention is a wet spring. I am continually amazed at the number of people in WI who have no idea about burning laws and regulations. Knowing you will never fully reach everyone and it only takes one careless uneducated person on the right (or wrong) day to start a catastrophe, you need to balance the amount of resources that you can invest in this problem. I suggest that the emergency fire warden program be completely eliminated. It has exceeded its usefulness and the new burning permit program has proven to be more effective. I would also suggest that you could use the current burning permit program to limit burning even further by allowing it only on the safest days (i.e. When its raining).

T. Mulhern Forestry

FP-3

<p>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)</p>
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DNR STAFF COMMENTS

224. What is 7 day scheduling?

Division of Forestry staff

225. If the coop areas are a high risk why are they not in a extensive or intensive are to begin with? Seems to make more sense to incorporate these areas into the protections areas. It would make it easier to most people to justify the resource shift. Also we are told every spring to pack a bag just in case. We are more mobile than we ever have been with the fire suppression units. There is no place in the state that we can't have resources to in large numbers in less than 2 hours. As for the alternative scheduling, some stations only have 2 people for fire suppression. If you start to mess with that you are also messing with the fluidity and cohesion you develop between stations and areas on fire suppression. It would not be very wise to start splitting up people to save a few dollars in overtime, it may cost a lot more in the end.

Division of Forestry staff

226. If the intent here is to move resources (tractor plows) from landscape 10 to staff coop areas, I am in total disagreement. Much of this landscape I am familiar with (not my own) contains much deep woods- heavy soil- non accessible forest land. While this may not be a highly fire prone area, if we move resources from here, these fires will be bigger and much more expensive. Fire Departments are not in favor of this nor have capability for filling our role here.

Division of Forestry staff

227. Support for the reallocation of resources based on risk and need statewide.

Discussion point on 7-day scheduling:

(+) More effective coverage and utilization of resources statewide on any given day. Eliminates some of the guessing and weekend negotiating decisions to determine staffing levels. May add some certainty to employees who may have a clearer understanding of commitment and days of work. The state will also have a better idea of what its minimum resource availability is on any given day creating greater flexibility to move resources and support other areas.

(-) May not allow for an employee to have any weekend plans with family, or employee may be in non-work status on a weekday that is perceived to be wasted because rest of family ay be working or in school. May not be a fair way to implement a schedule between employees. May be prohibiting employees from doing work in their work unit. Concern for the misuses of LTE's and other personnel in different HR classifications.

Division of Forestry staff

228. I agree with dropping the exclusive use contracts for the SEAT.

Division of Forestry staff

229. The word shift may not be the best. To me it connotes a temporary change. Perhaps transfer is a better word to use.

Division of Forestry staff

230. Partially Agree. Shifting of resources needs to occur on a more regular basis during critical fire weather periods for specific lengths of assignment to be determined based on need at the time. Short IMT's within areas and seven day scheduling for initial attack personnel should be pursued. One or two Type 2 IMT's should be made available for statewide response. Permanent assignment or shifting of resources into high hazard landscapes, or even into coop areas, should not be done at the expense of walking away from our fire protection obligations. Such shifting also needs to consider the nature of, and impact on, our integrated forestry work within current organized protection areas. It may make more sense to seasonally reallocate resources into higher hazard landscapes for a small portion of the year when needed rather than permanently reassigning foresters, technicians and fire equipment into these areas when a forest management work void would be created behind them year round.

Division of Forestry staff

231. The capability of the local fire departments should also be a factor in where to reduce (or increase) resource.

Division of Forestry staff

232. Disagree with "Investment will be increased in cooperative protection areas that are not at high risk of wildfire". Would encourage 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 FTE investment is actually justified. Just because a risk map shows a need, much more work needs to be done before making a significant investment of our limited resources.

Regarding shifting resources within the state and reducing the Division's investment in lower risk areas: Needs to be clarified as to what is meant by this statement: Equipment? Personnel? What about the other non-fire work currently being done in the lower risk areas? Confusing to me.

Division of Forestry staff

233. Shifting state resources to the southern part of the state in coop areas that have large well equipped fire departments already in place and functioning is short sighted. The northern lake country is where the development pressure is and will accelerate when the economy recovers. Here in Iron County there are fires every year that are beyond the capabilities of local fire departments. (Average age of 60+ for their FFs in some FDs) Using fire departments for small fires can triple the costs to local tax payers. One example in Mercer is fire # 93, 1 ranger spent 1 hour to suppress small fire for a total cost of \$45.58. If the fire dept went with their standard 5 trucks(x \$50 per truck) and 15 (x \$15 per man) men it would cost tax payers \$475 and be done without safety gear. So this a cost shift, not total savings.

Division of Forestry staff

234. Shifting resources around the state seems like a good idea that would provide many positive experiences for many Rangers and techs. Unfortunately the only staff that seems to be shifted is Central Office Super Rangers who chase fires around the state at will. Many times taking positions from local resources on fires and essentially denying them important experience and training opportunities. The fact of the matter is that these personnel are lining their own pockets on overtime and stand -by shifts and are really left unchecked. These resources are moved around the state at a greater expense than there would be utilizing more local or adjacent resources. However because they do not cost local budgets anything they are most often called as they have their own budget as opposed to brining in an adjacent resource where the team requesting pays all expense. So essentially when local budgets are concerned it is cheaper to bring someone in from central office (300 miles) than from an adjacent area (80 miles). This needs to be corrected. This has made the gap between the field and central office wider and caused much resentment from the field Rangers when they do all the work and then the staff from central office gets all the glory and pay. We need to use field Rangers and Techs first and use central office as a last resort. It's our job.

Division of Forestry staff

235. Investment will be increased in cooperative protection areas that are now at high risk. I suspect that most of these cooperative areas aren't using a burning permit system. The town chair has the authority (and responsibility) to say

no to folks that want to burn. We're enabling them by allocating resources to their areas. This is an unnecessary cost to the tax payers.

Division of Forestry staff

236. The shifting of resources to efficiently prepare etc is necessary and it is also necessary within other elements of the forestry division. State Forests could really benefit from having "passionate" foresters and technicians (people who want to be in the woods marking, performing recon, cruising, and most importantly have ownership for the work that they do and the area they are working) reallocated to spend their non fire season working on the state forests/lands.

Division of Forestry staff

237. Agree. Move resources to where they are needed. A lot of time and money is wasted in lower risk areas. Many times the local fire department gets to the location before DNR personnel anyway.

Division of Forestry staff

238. (FP-3) Overall the Co-op areas are lower risk, but I do agree that the areas of Co-op that have higher risk to wildfire should get more emphasis and help from the department. In order to implement this, will it be a new priority for the Rangers and Techs in the adjacent areas to help out those higher risk Co-op areas? I don't think it should be the adjacent Ranger's responsibility seeing as they have to deal with their own FRU already. I think that more staff may be needed to help the Co-op specialist accomplish the goals in these higher risk Co-op areas, and the new or current Co-op resources should be kept in the Co-op areas to assist those FDs.

...

I strongly agree in shifting resources within the state when there are areas seeing higher fire danger and a greater amount of starts. I have heard this being talked about for the last few years but I never saw opportunities in my old work area. I offered myself up each season to be moved around because of the large amount of resources in my last FRU allowed me to be used elsewhere while my FRU would still have been covered. This never happened. There are a lot of Rangers and techs who could use extra experience and exposure to different parts of the state was those areas are hot and need more resources. Especially the younger Rangers and techs with open task books, but there is opportunity for some of the older guys too. I definitely that the local fire field personnel should be used more often to be shifted than the resources from the central office. I've seen and heard more movement around the state from the central office fire personnel than the local units. In most cases I feel it makes the most cost and financially responsible sense to move personnel that are already nearby the hot spots in a given season than having those resources come from central office. Mileage costs would be reduced and experience opportunities are offered to a wider array of employees with different experience levels.

Division of Forestry staff

239. I am very support of focusing on local, rapid response IMT with expanded regional teams. This should be followed up with developing a training rotation and short team specific training. It would make sense to train the regional teams as all-risk teams.

Division of Forestry staff

PUBLIC COMMENTS

240. I don't agree with shifting existing resources from perceived lower risk areas to bolster suppression response in the "Coop" areas. If new forest fire suppression needs have developed, then new resources should be solicited or reallocated from non-suppression activities to provide coverage.

M. Luedeke

241. Agree. Fits well with FP-1. Again, it's how it should be done. I hope the DNR will be able to effect the moves to make this happen.

N. Paulson

242. "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."

The FDAC supports the expansion of the Cooperative fire program to more effectively address wildland fire problems and improve wildland fire protection capacity outside the DNR protection areas. The FDAC further supports the maintenance of Division Incident Management Teams for use in wildland fire and all risk incidents. These IMTs provide an immensely important role for 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.

Fire Dept. Advisory Council

243. I hope as part of this shift in resources that the Division will seriously consider eliminating fire towers in all but the most critical fire landscapes. Given the age of the towers, their cost of replacement and their effectiveness, I think it is time to reevaluate their need.

T. Mulhern Forestry

FP-4

Proposed Change: The Division will eliminate exclusive use contracts for the SEAT program. (FP-4)
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DNR STAFF COMMENTS

244. Easements cost less than acquisition but what is the business plan for the cost of long term monitoring. I believe there are some lessons learned from Land Legacy easements and the work involved dealing with illegal splits, poor management, etc. As identified this would be an increased investment. The caution is to adequately identify the proper amount of increase.

Division of Forestry staff

245. Really good, let's finally utilize GLFFC more and receive help, not just give it.

Division of Forestry staff

246. Mostly supportive of this elimination. No support for an increase. Concern that there is some recognition that the state should have the ability to increase its resource needs based on the risk at the time. Whether this is through CWN contracts or importing other non-state resources.

Division of Forestry staff

247. In the past we did "call when needed" aircraft. It was very expensive and sometimes aircraft wasn't available when we needed them. It was cheaper to go to exclusive use contracts and that's why we went to them.

Division of Forestry staff

248. Agree. SEATs have shown to be of little value on a statewide basis. Bring in aviation resources during critical times of need, not on a regular basis.

Division of Forestry staff

249. I can't argue with the concept of dropping the exclusive use but hope we can still use suppression aircraft of some sort on a call when needed basis. We also need to look at cost sharing helicopter use with MN DNR especially in Burnett-Polk-Douglas counties.

Division of Forestry staff

250. Appropriate direction. Seats are not the best bang for our buck statewide because of our varied amount of available water across the landscape and their land based intensive support needs. Call when needed will give us the flexibility to work with our partners to provide the best aircraft for the job given the particular need, without having a fixed cost every year.

Division of Forestry staff

251. I agree with this recommendation as long as we continue our partnerships with other agencies to provide aerial suppression capability during peak forest fire danger situations in high risk areas.

Division of Forestry staff

252. I agree that we should discontinue the use of SEATS.
Division of Forestry staff

253. Agree.
Division of Forestry staff

254. I would like to hear some of the background surrounding the elimination of the SEAT program. I have never been involved in the administration of that program, but since we will now rely directly on our partners for air resources, has this been approved by our partners? I don't know if these conversations were held, but I do think a lot better collaboration with other fire agencies within the state is essential and needed for effective fire management.

To continue with my thoughts on cooperation with our partnering fire agencies within the state, I feel it is essential to have good working relationships with these agencies. Typically, on the ground these relationships operate well, but I definitely don't get the same impression with the administrative levels of our agencies. There should be better working relationships and better cooperation on both sides. I think a perfect way to do this is to resurrect WIFC. WIFC is a great opportunity for consistency and better working relationships between partners within the state and it should be utilized as a tool from trainings to operations. I'm not sure why we backed out of this, but I feel its a valuable tool for collaboration and consistency, and it should be reconsidered.

Division of Forestry staff

PUBLIC COMMENTS

255. Agree. While the SEAT program did provide benefits and public awareness, the cost of this suppression resource was too high versus the benefits. The savings generated by dropping this SEAT program should be reinvested in the account used to reimburse rural fire departments for suppression assistance. Many rural fire departments have maintained cooperation with the DNR under the very outdated MOUs but are rapidly realizing that the reimbursement rates do not reflect current costs. Some are beginning to perceive this as a shift of WDNR responsibilities and costs indirectly onto local FDs and municipalities. The value of the MOU and need for the Fire Department grant program is declining, which will give fire departments new motivation to withdraw from the outdated MOU. Apply the SEAT funding to increase the fire department reimbursement account for helping with suppression of forest fires.

M. Luedeke

256. This does not explain exactly what will be done to provide Air Support. Are you a member of the "Compact"? If you are and leave what changes? What does "... maintain relationships..." mean? How will you provide any needed Air Support?

N. Paulson

257. "The Division will eliminate exclusive use contracts for the SEAT Program."
The FDAC understands and supports the elimination of exclusive use SEATs. The FDAC would also like to state again the support of the Division aircraft and pilots. The use of air resources as platforms for fire detection, intelligence gathering and as a safety lookout for all firefighters is vitally important.

Fire Dept. Advisory Council

258. I fully support. Their cost outweighs their effectiveness.

T. Mulhern Forestry

FP-5

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)

DNR STAFF COMMENTS

259. Support to maintain. Important demonstration of the importance of the FD partnership. Discussion centered on use and implementation of the program. Grant money should be focused and awarded to entities in the greatest need. Many departments no longer need this and use it only to create ‘warehouse’ items. Grant should be focused and set clear priorities.

Division of Forestry staff

260. From what I heard was that we would limit funding like WFLGP away from folks already in MFL. We make the opposite argument with WUI and use the carrot of funding to get people to sign a CWPP. My real concern is MFL and planting. This is our major cost in my area. In pine stands we do not have natural regeneration. We need to keep funding for people to plant to keep their land meeting MFL stocking requirements.

Division of Forestry staff

261. Agree. Maintenance of the FFP grant is critical to maintain strong VFD / DNR partnerships. However, I recommend shifting grant priority away from VFDs that charge for all initial attack wildfires and towards those who provide assistance at no cost. Develop a payment structure that puts DNR more in the driver seat as opposed to VFDs. Pay them according to standard rates whenever DNR needs them to respond and we are not available or when additional resources are needed.

Division of Forestry staff

262. If we are already giving grants to local fire departments and provide backup when requested, why are we going to increase spending in this area without changing the protection status?

Division of Forestry staff

263. There is no doubt that fire departments are better trained, better equipment and in many cases more eager to be involved with wildfire suppression efforts. It will be essential to consider the limitations of volunteer fire departments when potentially asking them to step up their wildfire suppression involvement. Manpower may be a limiting factor that will have to be considered. Continuing grant programs and training opportunities are great ways to better equip fire departments to meet their needs for involvement in wildfire suppression efforts but effective communication lines will need to be maintained so fire departments completely understand what DNR might expect from them. It will be very important to clarify roles and come to agreement on those roles with local fire departments.

Division of Forestry staff

264. I agree that we should continue the current investment in local FD.

Division of Forestry staff

265. I think this could be moderately increased. I think local fire departments are capable of doing the majority of suppression and prevention. Re-allocate money from prevention programs.

Division of Forestry staff

266. (FP-5, 6) FFP and training are definitely items that are important for this agency to continue. The training side of things would best be collaborated with WIFC (if we can resurrect it) to be better tied in with our partners. Great opportunities for better coordination from training to operations can be utilized with our partners in WIFC.

Division of Forestry staff

PUBLIC COMMENTS

267. Agree to maintain the FD grant program but perhaps at a reduced level. Many fire departments have participated and added safety equipment over the past years for forest fire suppression responses but have shifted requests towards purchases that are less essential. This grant program should be examined to evaluate the shift in lower priority purchases to determine if a portion of the grant program can be reallocated to increasing the reimbursement rate for fire departments that accept a new, updated MOU and yet maintain a grant amount for vital forest fire safety items.

M. Luedeke

268. Agree.
N. Paulson

269. "The Division will maintain its current investment in providing FFP grants to local fire departments to assist in suppressing and preventing wildland fires."

Again, the FDAC supports the vital partnership between the Division and fire departments. The FDAC also cautions that any cost savings for the Division must not be made on the backs of local fire departments. Local fire departments also are feeling budgetary pressures and cost concerns. Furthermore, fire departments, due to their voluntary nature, feel the pressures of limited time and diminishing interest. The only way to efficiently and effectively provide wildland fire protection services is through the Division/fire department partnership.

Therefore, the 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.

Fire Dept. Advisory Council

270. I support this investment and would like to see local fire departments take over wildland fire suppression in lower hazard fire landscapes during less critical fire months such as the summer, with DNR responding only on an as needed basis. Increase funding for this by elimination of the fire towers in most areas of the state.

T. Mulhern Forestry

FP-6

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

271. Support to continue to have training. Discussion centered on delivery of and target audience. Training levels should be clearly communicated by position, and effort should be made to improve and maintain quality of. Training should also be viewed in two categories: (1) to provide the skills necessary for new hires to be able to do their job, and (2) maintenance or recertification/ refresher to provide for continuing education and skill development and exposure to changing technologies and businesses practices. Funding should continue to be available for training and alternate delivery methods should be considered such as 1 on 1 learning at different field stations in different fire landscapes.

Division of Forestry staff

272. Training is extremely important to efficiency and safety. FD's do not have the money to invest in training and the tech school is getting more expensive and more difficult to work with. The fire assessment told us that we are seen as the experts in the field. We should be expanding training to FD's and the community. Reductions in WUI, and most air suppression and management could make up this increase. Training is relatively cheap cost but can be time expensive.

Division of Forestry staff

273. I think "current levels" needs to be explained or defined.

Division of Forestry staff

274. Agree. However, Federal grants are commonly available and should be pursued in earnest for large scale exercises including events such as mock fires to offset costs. Consider establishing a team of trainers who would be available to go throughout the state organizing and conducting such exercises, especially in those areas that haven't had the luxury to conduct mock fires due to heavy workload.

Division of Forestry staff

275. Safety of firefighters and the public is the top priority in the fire protection program. I totally agree but in reality I believe that this is more lip service than reality.

1. We need to implement some form of physical fitness standards. We set on this fence and do nothing when we have firefighters out there who can not be expected to do many of the tasks expected of a wild land fire fighter or for that matter basic forest management activities. Not having a moderate level of fitness is a hazard to themselves and to others.
2. We need to follow NWCG training and qualification standards and promote training in and outside of the department. We have many managers who hold a position or qual. simply from the title they hold and not because of anything they accomplished. Fast tracking and grandfathering is dangerous and provides for leadership that is flawed and artificial as opposed to real earned recognized leadership on the fire ground. We need to be professionals from the top down and that also means being recognized from our peers and partners in the wild land fire community. We can not effectively always Wisconsinize and be able to work with our partners on even ground. My experience with our partners tells me that we are losing respect and are no longer leaders.
3. We need to remove the glass ceiling on good employees when it comes to training.

...

In closing I believe that the new administration will require us to be leaner and meaner. We need to focus on our core work being accomplished. We have many great employees who are willing to step up to the plate. We also have many LTE's that do an excellent job. However, why do we still pay retired employees to do work that could be accomplished by current employees. An example is why did we have a retired Area Forester research and present a fire that happened 50 years ago at Ranger recert. The lessons learned program that is available for free would have had much more value to students. We still pay his ending wage at \$31.00/hr. Why is same person teaching the Safety Officer class? Let current employees step up to the plate. We need to start this process by hiring a Chief State Forest Ranger who has solid qualifications and has experience and willingness to work with other agencies and staff from the bottom up. We do not need full time fire fighters we just have to strive to be the best for when we are needed.

Division of Forestry staff

276. Agree to some extent. Although out of state incident assignments are not specifically mentioned when it comes to training I personally believe that actual hands on experience in "live" situations provides learning opportunities that drills and scenarios can rarely supply.

Division of Forestry staff

277. Education is very important. Any one can attend training and get checked off on attending but whether that person was educated during the training session is unknown. Our training sessions should have an evaluation portion to see if attendees have indeed learned anything during the session. It is a personal responsibility to be accountable but some employees have no reason be accountable if they don't need to demonstrate their gain of knowledge or if they don't have a care in the world.

Division of Forestry staff

278. It is time to enact a physical fitness standard that protects the firefighter and promotes the employee to bear some wellness responsibility as well as protects the Department for liability that could occur from an employee's poor physical conditioning.

Another consideration that was not specifically addressed is the issue of fire only staff that are utilized minimally (or maybe not utilized at all) for forestry work. There is a perception in the state that there are 3 distinct groups of field forestry staff; forestry only (with no fire responsibility) staff, well integrated forestry/ fire staff and fire only staff that the rest of the staff wonder what do they do the rest of the year staff. Let me stress that this is a perception and I don't have a good feel for the reality of these circumstances. A lot of this is a cultural issue, but this is too often the unspoken elephant in the room. If there is field staff that are doing 80%+ of their time for fire activities, is it good use of time? Explanation to the rest of the staff that their time is well spent would be good for moral and help just if their positions.

Division of Forestry staff

PUBLIC COMMENTS

279. OK.

M. Luedeke

280. Agree.

N. Paulson

281. "The Division will continue to fund training as a basic function of the fire protection program at current levels."

The FDAC supports the maintenance of the Division workforce as the experts in wildland fire through training. The FDAC also supports the maintenance of training of fire department members to be effective in emergency response and maintain safe operations on wildland fires. The Division experts are the only source of effective wildland fire training in the state. Local experts offering wildland fire training locally is the most efficient and effective training available. Division experts (Forest Rangers and Technicians) are held in high regard in the fire service. The fire service recognizes this expertise and readily seeks training opportunities with the Division. The FDAC strongly endorses continued wildland training opportunities for fire departments.

Fire Dept. Advisory Council

FP-7

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)

DNR STAFF COMMENTS

282. Support to maintain safety and enforcement at current levels.

Division of Forestry staff

283. The combination of safety and law enforcement into this one statement I think effects how it first can be assessed and how it can be operationalized. Safety should always stand alone. Personally, Law Enforcement needs to be assessed for the amount of resource (time and personnel) that is involved that could be utilized else where in the program. The question of who should be doing this needs to be fundamentally discussed. This is a perfect example of because we have done this in the past we should continue to do it. We either adapt and become full LE officers, enforce all state laws and public lands, partner with wardens, etc or abandoned credentials. Forestry can still do investigations or use specialists and have LE issue the citation. The freed up resource could be used in the COOP program, prevention and WUI.

Division of Forestry staff

284. Give LE to team leaders or wardens. This reduces initial training costs and ongoing yearly training costs. Minnesota uses their warden staff for fire LE. This frees up time to other fire staff to handle fire training.

Division of Forestry staff

285. Partially Agree. Law enforcement investment should be re-evaluated to consider alternatives. The amount of time spent on initial LE training of forester/rangers is no longer appropriate considering the little time devoted to this activity throughout any given year. Invest in fewer, but fully qualified forestry law enforcement officers, as opposed to having every forester/ranger maintain credentials. Consider doubling up the duties of state forest officers with forester/rangers to make them more diversified and valuable.

Division of Forestry staff

286. Specifically, I agree with FP-7 which deals with training for fire protection and law enforcement officers. I would like to see the Division actually increase its investment in law enforcement training because I think we can never have enough, but I'll take "maintain" over "eliminate" or "decrease."

Division of Forestry staff

287. Safety has always been a focus and should continue to be a focus for those involved with fire suppression activities as well as all employees. Although maintaining our current investment in safety is clearly a good option I would suggest that increasing our investment in safety should be considered. The hazards of fire suppression appear to be increasing, or at least our understanding of some of the hazards is becoming better understood. To keep pace with our growing knowledge of hazards may require a greater investment. Smoke exposure and physical fitness are important items that directly impact firefighter as well as public safety and increased acknowledgement of these issues will be critical to maintain safety on the fire scene. Perhaps funding saved by eliminating the SEAT program and greater efficiencies in the burning permit system can be directed toward increasing our investment in safety. History from the past decade shows us that implementation of a "Physical Fitness Standard or Physical Fitness Testing" program will be challenging to implement. Perhaps exploration of an overall "Wellness Program" that promotes both mental and physical health would be a better option to pursue. All employees, not only "protective" employees, would benefit from such a program. The current political atmosphere may not be the best time to pursue implementation of such programs but the long term benefits of these types of programs and cost savings through reduced lost-time employee illness, injuries, and health insurance premiums cannot be understated.

Division of Forestry staff

288. Maintaining our current investment in fire safety and law enforcement is a good idea but it NEEDS to go further! We need physical fitness requirements for firefighters in this Department! We talk about fire-line safety constantly, its brought up in every briefing and AAR, but we have no basic physical fitness requirements. In my eyes this is blatantly hypocritical and a shame. It is a hazard to other fire fighters to have people fighting fire in our agency that would not pass a simple pack test. I do agree that the pack test is not a perfect way to test a fire fighter's physical preparedness to fight fire, but at least it is something to set a standard by. Fortunately we have not had a fatality directly related to this issue, but I feel it is essential that we have a standard we're held to before we do lose a life on the fire-line. I guarantee that once a fatality occurs because of the lack of physical fitness standards, a standard will most definitely be enacted following the incident. Humans learn from tragedies historically, but in a simple issue like this, prevention is a known method to keep tragedies from happening and it just makes sense to prepare in this case. Let's stop pushing this issue down the road. Fatalities are not needed in order to act!

Division of Forestry staff

PUBLIC COMMENTS

289. Strongly agree.

M. Luedeke

290. Not sure what this one means. What safety are you talking about? FP-6 is where you train fire safety for your people and some others.

...

You do not briefly explain LE's role, i.e., "efforts", in fire and what investments you will continue. Is this DNR LE or other such as Sheriff's? Lastly, all fires should be investigated for cause to fully understand the fire situation and very few of the fires will be "arson". If you have an arsonist it is clearly "critical" to ID him/her and make an arrest.

N. Paulson

291. "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."

The FDAC strongly endorses wildland fire safety as the highest of priorities. The FDAC also again recognizes the Division as the expert in wildland fire and supports wildland fire safety training and information is offered to fire department partners.

Fire Dept. Advisory Council

FOREST HEALTH (FH)

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.

DNR STAFF COMMENTS

292. Use of the term "effectively manage" and similar phrases I feel need to be refrained from. Even in new detections should not be discussed as eradicate. The fact is usually once found there is usually more sites already established. I suggest a focused role of detection and science based research on impacts to ecological systems from invasives.

Division of Forestry staff

293. Support to utilize resources on the highest priority issue and workload.

294. As written on page 10 I think the statement of the division of forestry's role as it pertains to forest health is right on. With that being said, the proposed change box talks about reduction of gypsy moth suppression efforts. This is counter to the role just mentioned. I understand the reasons for reduction in efforts for this program with the expanding issues we face and we have had discussions and have implemented processes already that have helped reduce workload. I am in support of this reduction and possible eventual phasing out of this program IF there are other practical private alternatives for dealing with this pest. In rural areas this may be likely but in urban areas I question we will see adequate alternatives especially in the next 5 years.

This reduction in gypsy moth suppression is stated as being done in order to more effectively manage higher priority invasive species. There are few invasive species that we can manage on a forest or canopy scale and truly play a role in reducing impacts. The gypsy moth suppression program is currently the best example of a successful management program where we can actively prevent damage to the forest system. One other successful management effort that is starting to develop in our program area is treatment efforts for annosum root rot. That doesn't mean these are the most problematic invasive species but at least ones we have some level of successful management answers for. Yes, there may be worthwhile mitigation efforts for things like emerald ash borer but currently those efforts will not stop the death of ash by this pest at the landscape forest scale.

Division of Forestry staff

295. As I've said before, invasive species will be our final demise in the forestry world. Attack now, as is planned. When sugar maple finally gets its foreign disease, the north is dead.

Division of Forestry staff

296. Agree with concepts.

Division of Forestry staff

297. Overall supportive of the direction and the concepts outlined for the FH program.

Division of Forestry staff

298. Agree with the role and proposed change and program maintenance.

Division of Forestry staff

299. Changing the emphasis of forest health to invasive plants is a good idea.

Division of Forestry staff

300. I disagree with the overall proposal. Maintenance is not enough.

301. A lot of program maintenance here, some reduction with gypsy moth suppression, but no increases suggested at all. Forest health is not something that is easily transferred to the private sector or the University System without the loss of objectivity and sustainability. I believe the government should play a larger role in this type of activity. We should invest more in each area (all intent statements). The only trade-off that might be possible would be by taking resources from the nursery program (in the form of staff and/or sell a facility). Or scaling back any of the larger pieces of the pie (private forestry, fire protection – not sure where exactly).

Division of Forestry staff

302. I agree with the direction outlined for forest health, there are more challenges annually when it comes to insects, disease and invasives that are attacking our forests.

Division of Forestry staff

303. I agree with the direction of this program.

Division of Forestry staff

304. The BWM agrees with the overall strategic direction for Forest Health including the Division's investment in invasive species work.

DNR staff (non-Forestry)

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

...

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

...

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

We support the proposed shift in investments from gypsy moth control to other emerging priorities. We strongly support all four intent statements to maintain support for invasive species detection and control, for following BMPs, and for strategic education and outreach. We strongly support such underlying Forest Strategy actions as "Focus resources on priority species control, in priority areas, as identified through risk assessments." We would encourage Forestry to continue working with Lands as we identify those priority areas.

Division of Forestry staff

PUBLIC COMMENTS

306. Proposals look good.

P. Dayton, Vernon Co.

307. Agree with the role and proposed change.

G. Rebman, USDA-NRCS

Forest health is obviously critical to sustaining forests. This is an area of major concern to Wisconsin and other states. It needs a robust DNR program for both native and invasive species.

N. Paulson

308. One reviewer pointed out that a possible outcome of diminished Gypsy moth control may be public reaction to defoliation of aspen and oak, and other detrimental impacts from the caterpillars. We may need to work together on public messages about forest management trade-offs associated with highly visible and sensitive changes to traditional management practices.

P. Strong

309. Invasive species in the long run can have a deleterious impact on our forests. We already know the composition of our forests has changed and invasive species are in part to blame. We believe recent efforts brought about by your Division and the Forestry Council are an excellent step in the right direction.

L Hanson, WWOA,

310. I support the Division of Forestry's efforts to recognize potentially significant health threats and to develop appropriate responses. However, I am concerned that some of the preventative measures designed to protect forests are of little value, and add significantly to harvest, storage, and transportation costs. Such measures ultimately endanger the economic viability of logging businesses, forest products facilities, and entire communities. In particular, I would urge the Division of Forestry to take a lead role in helping to eliminate the onerous restrictions placed on the forest products industry by virtue of the gypsy moth "slow the spread" program.

S. Kariainen, Louisiana Pacific Corporation

311. I was pleased to see recommendations for: Emphasis on invasive species

J. Solin, UWSP

312. The Division's role could be increased in tracking and monitoring the spread of invasive species. The Division could be more actively engaged in the eradication of both native and non-native species and plants and the Division could also serve as a clearing house providing information to all landowners assisting them in identification and control of the adverse affects invasive species have on the forest.

H. Schienbeck, Great Lakes Timber Professionals Association

313. In the Forest Health section of the document we believe the first sentence is missing an important reason for maintaining forest health, "maintaining a reliable supply of raw material for Wisconsin's forest products industries". We request that this or similar language be added to the first sentence and suggest that it be the first reason listed.

J. Severt, Wisconsin County Forests Association

FH-1

<p>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)</p>

DNR STAFF COMMENTS

314. There are many forest insects and diseases that kill more standing trees than gypsy moths. Prioritizing work on these other insects/diseases is more in-line with the Mission of the Division of Forestry. The caveat is shifting resources away from the Gypsy Moth Suppression Spray Program is politically risky. Therefore, an extremely important component of FH-1 is FH-4 (i.e. outreach and education about forest insects and diseases and their management).

Division of Forestry staff

315. In terms of the "this for that" of financial resources being allocated toward various efforts I would question the continued effort of risk modeling and imagery map development. Although these may be somewhat useful tools for on the ground detection work I believe these products are more of a large scale analysis and political marketing tool. I think an example of this miss-directed effort would be to look at Michigan where emerald ash borer went undetected for years as more efforts were being put into modeling which took away from resources for on the ground survey efforts. Emerald ash borer was finally stumbled on as a cause of ash mortality by a university plant pathologist after being present and causing severe damage for many years.

Division of Forestry staff

316. I have some concerns that the broad umbrella of "Invasive Species work" could imply expanding the level of resources spent on some species that I feel are simply unwinnable using our current strategy. To be truly effective with

species like garlic mustard, buckthorn to name a few we would need to go after them on all properties not just a few parcels within an infested landscape, and then control the re-introduction routes. To expend greater resources on that battle without a better game plan is kind of like entering into a Vietnam like war where the enemy just keeps coming back from the other side of the property line (DMZ). There must be a better way that has a likely favorable outcome the just throwing more money at it.

317. I have been saying that we should be reducing our investment in Gypsy Moth for at least 10 years now and I agree we should be going in that direction. It was clear to me that many years ago we understood that we would not be able to control Gypsy Moth. At that time we should have implemented the slowed the spread for 5 years to allow time for short term management changes to mitigate initial infestation, but then we should have stopped so our forests would begin to adapt.

Division of Forestry staff

318. (FH1-4) limited discussion on these proposed changes or investment levels. Support to utilize resources on the highest priority issue and workload. Discussion on conducting a specific assessment and strategic plan for education and outreach. This item is also referenced in UF and CP and will be expanded on in (CP-4). Support to consolidate pest update releases by region into one scheduled release rather than each region distributing and then being forwarded multiple times. FH should also have some oversight and monitoring on Insect and disease prevention protocols and follow up such as the annosum/ sporax issue.

Division of Forestry staff

319. Strongly agree. Invasives are a huge threat and no one else has taken a strong leadership role in addressing forest invasives - DNR needs to do this and motivate landowners/partners to manage appropriately.

Division of Forestry staff

320. Does "invasive species" include native as well as non-native plants, insects/animals and diseases? 5 year time frame may be too short for the reduction in GM effort.

Division of Forestry staff

321. Agree. However, some level of Gypsy Moth suppression assistance should be maintained in order to respond to periodic outbreaks and hotspots as they occur.

Division of Forestry staff

322. Agree - spending money on gypsy moth is not cost effective.

Division of Forestry staff

323. The gypsy moth program should not be reduced. It provides an effective, safe and inexpensive service to local governments that would have a hard time making their own arrangements for spraying due to issues such as liability and licensing. This program would be most difficult to replace in urban areas. It is more efficient to have one contract and a relatively simple program statewide, compared to many communities and counties all doing the same things individually. The urban and recreational area trees are our most valuable ones and should be receiving at least the current level of investment from the forest health and urban forestry programs. Improved public service is supposed to be a major priority for the new administration, and the gypsy moth program provides very visible results in the urban areas that pay most of the taxes that fund the DNR.

Division of Forestry staff

324. Are there any proposed alterations to the time spent on native insects and diseases? The forest health program spends a lot of time on services that could be provided by the private sector (for example, diagnosing pest problems for individual landowners, which benefits only the individual landowner yet everyone has to pay for it).

Division of Forestry staff

325. I thought FH-1, FH-2, FH-3 and FH-4 were on the money and I agree with your decision to reduce gypsy moth suppression work

Division of Forestry staff

326. FH-1 & FH-2 Agree with, BUT local Foresters are given less training and time to investigate insect and disease complaints. (also directed by work reduction email to do less) So I am not sure how the Division is going to continue to provide good detection...

Division of Forestry staff

327. The increase emphasis on invasive species work is essential to our ever changing environment. There should also be an increase on the amount of information that is distributed about the knowledge of these invasives.

Division of Forestry staff

328. Agree.

Division of Forestry staff

329. YES YES & YES. We need to address invasives a lot more both in the private forest and state owned lands. And maybe even more of any effort on plants as opposed to gypsy moth as stated. WHY –it is a huge concern silviculturally (think reed canary grass & EAB)—loss of native plants and thus habitat...

Division of Forestry staff

330. (FH-(1-4) I strongly support the increased effort to address invasive species and work to slow spread and stop it if possible in areas that are true concerns for a specific species. Working with other DNR divisions, state agencies and local municipalities is a good start but where I've seen some of the largest need of control is on private lands. This should be an area that we invest more time in. I continually recommend to landowners the need to control either a widespread, or simply a budding invasive problem on their property when I come across them but the information falls on deaf ears. I would say that 5 to 10 percent of the landowners I raise the issue with plan to or actually do something about it. I understand the property owners right to do what they want with the management of their land, but when it comes to the point that a small population of invasives tends to be more manageable when dealt with in the early stages and can easily lead to a population spike and then it spills over into adjacent ownerships. The prohibited/restricted law for transporting invasives is nice, but the actual on the ground control of infestations is much more important and the worst of the infestations I've seen originate on private properties whose owners do not put in any effort to do anything. I feel something should be done to have landowners treat this stuff. Education is a good start, which is where I've seen this 5 to 10% response from landowners, but that's obviously not enough. The current push for smaller government would not make addressing this any easier when regulations would be an appropriate step in the right direction and more regulation is the last thing on the current majority in our legislature wants. But some how a push to get landowners to care about stewardship and the understanding of the negative impacts of invasives is essential, with the need to actually get people to act.

Division of Forestry staff

331. Agree.

Division of Forestry staff

PUBLIC COMMENTS

332. While all of the programs the Division of Forestry administers are important, it can be argued that forest health has primacy, or shares it with only a few other programs. Again, generally speaking, the Paper Council supports the proposals identified in the document; particularly the recognition of emerging priority needs (FH-1).

An important need for the paper and forest products industry – not clearly addressed in the document – is for the state to improve its incorporation of, and responsiveness to, stakeholder input into forest health challenges and responses. For example, greater recognition of the potentially debilitating impacts of quarantines on the movement of commercial shipments of wood from forest to manufacturing sites is crucial.

The Paper Council suggests that the DNR investigate ways in which it may assist in facilitating the movement of forest products across quarantine boundaries in cases where restrictions or limitations seem to be driven more by administrative or “paperwork” issues and less by forest health concerns.

Clearly, forest health constraints cannot be analyzed solely by their financial impact on Wisconsin’s forest products industry. However, timely recognition of changing forest health conditions or realities, and the consideration of responsive

options that are sensitive to the needs of both forest health personnel and companies dependent on an economical flow of raw materials need to be better reflected in this section of the document.

E. Gustafson, Wis. Paper Council

333. I have a doubtful or negative opinion of much of the invasive species work as done to this point. Many invasive species are of negligible impact or have been in the ecosystem so long that they will never be eradicated and might as well be considered "native." Much of this work has a rather evangelistic aura about it, is impractical and not cost effective. We are not going to turn the clock back to 1820. Suggestion: identify the top few most problematic invasives, prioritize them and concentrate on their eradication or control. Be aware of worst case scenarios and save dollars and resources for real problems. Don't duplicate the work of universities or the Federal Government. The DNR in my opinion has dropped the ball on EAB, has not even been able to have signs erected on major highways coming into the state telling travelers not to transport firewood into the state. It isn't inspecting nurseries for EAB, nor has it been able to make arrests and fine violators. This has been a "hot potato" issue, tossed from agency to agency. On the other hand, my little town of Bayfield endures aerial assaults which are intended to combat gypsy moths; these are poorly targeted attempts to control an invasive insect which the rest of the country is living with because it is impossible to control and does little long term damage. (FH 1,2,3,4)

A. Ode, Bayfield, WI

334. The Gypsy Moth suppression program should be phased out as soon as possible. The GM impacts to most of Wisconsin's forestlands were over rated and investment of WDNR resources was oversubscribed. Other surveys should also be downsized such as jack pine budworm surveys. Based on regional forest health reports, it also appears that the FH staff invest time in investigating little known, novelty insect problems found on gardens and ornamental plants that pose very little risk to Wisconsin forests. This time should be redirected towards handling and defining control solutions for larger scale forest pests (insects, disease, plants). Invasive species monitoring should become a larger role of the FH staff.

M. Luedeke

335. There are major invasive threats that need attention. What will the effects of reducing gypsy moth suppression be at the various levels you are considering?

N. Paulson

336. FH-1 is particularly important.

L Hanson, WWOA,

337. This effort must be watched very closely financially. These projects can be very expensive and have the potential to absorb a large amount of available financial assistance quickly. Sites should be evaluated and determined whether the cost/benefit of a restoration project is worthwhile. Funding should not be given freely and only those sites with the greatest potential of success should be priority.

K. Quast, Quast Forestry

FH-2

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)

DNR STAFF COMMENTS

338. No other agency or institution or company has the ability to objectively detect, delimit, monitor, assess impacts, and provide management recommendations for forest insects, diseases, and plants on all non-federal land in Wisconsin. According to the Summary of Public and Partner Comments Received on Version 1 of the Division's Strategic Direction (35

commenters), the most supported Division strategy (and the most supported actions) from public and private commentary was #23, which essentially states the job description for most members of the DNR forest health team. I am privileged to be a forest health team member because I feel support for our team from all corners of the Wisconsin forestry world. I had a private forestry consultant tell me he would lobby for our positions if they were ever threatened - that is how much we are appreciated. Credit goes to Jane Cummings Carlson for working so well during her career with the private sector.

Division of Forestry staff

339. I agree with the important information transfer from our pest specialists to our foresters and other partners.

Division of Forestry staff

340. Agree.

Division of Forestry staff

341. Field assistance from forest health staff is, and always has been, invaluable for foresters and landowners.

Division of Forestry staff

342. Agree.

Division of Forestry staff

PUBLIC COMMENTS

343. Don't support increase investment in risk model development but instead shift this investment towards more field time for FH staff to interact with DNR field staff and forest landowners. The GM risk map was not very accurate and provided limited utility to field applications. Better choice would be to invest in more rapid development of proven control strategies/methods for invasive plants.

M. Luedeke

344. This should be a big-picture role for the DNR. We should not be providing services for one individual (for example, diagnosing pest problems for individual landowners) unless there is some benefit to the state as a whole (for example, investigating suspected emerald ash borer infestations).

345. Does this program really need more attention rather than "maintain"?

N. Paulson

346. Support. This is a critical role for the Division to provide the tools and education to land managers to deal with these issues. One of the most startling realizations I faced after becoming an individual consultant was that I no longer had the network of information and resources that would magically appear on my computer or through area meetings, training sessions, and discussions with colleagues, etc. I now needed to seek out information on emerging forest threats, new silviculture, etc. The Division does a fairly good job of keeping cooperators informed of new issues but could do better through electronic media; better website, more opportunities for e-learning, etc.

And I guess I just commented on FH-4 above.

T. Mulhern Forestry

FH-3

<p>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)</p>
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DNR STAFF COMMENTS

347. Another reason I would caution reduction and possible phase out of the gypsy moth suppression program is the current administrations priority of customer service along with the internal value we are placing on partnerships. I think that the gypsy moth suppression program has been just that, a model in partnerships and customer service, which has resulted in successful management efforts.

Division of Forestry staff

348. Agree.

Division of Forestry staff

349. Agree we need to put more time and \$ in this area.

Division of Forestry staff

350. Controlling damaging invasives is going to include checking logging equipment before it is brought onto timber sales. This is going to be a huge workload to add to timber sale administration. What is not going to be done in order to provide time for this type of invasive work?

Division of Forestry staff

PUBLIC COMMENTS

351. Agree.

M. Luedeke

352. Agree. Working together is a multiplier if done right.

N. Paulson

FH-4

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)

DNR STAFF COMMENTS

353. OK, but need to think outside the internet.

Division of Forestry staff

354. BMP's limit spread but lots of work needs to be done for existing infestations. I do not have any confidence that landowner education alone will work for controlling garlic mustard on a landscape level scale.

Division of Forestry staff

355. The EQIP program can not be counted on for forestry funding. The application process is long and forestry ranks low against agriculture practices. The Hardwood Forestry Fund is not available for use on private lands, only public lands. This needs to be removed from this section of the document.

Division of Forestry staff

356. Public relations, public education and outreach are essential to the success of every program and initiative. This must be an on-going effort, not just a one-time or intermittent campaign. Investment in public education and outreach builds faith in public service and can restore respect for public servants. Every successful accomplishment should be put in the forefront, and public benefits should be continually explained.

Division of Forestry staff

357. Agree.

Division of Forestry staff

358. Agree. This shift is already occurring and like it or not we need to be at the table. Education and outreach, along with effective use of Invasive BMP's will be a critical component.

Division of Forestry staff

359. Social media is never mentioned or discussed. Seems like this is an important communication tool that needs to be weaved in the future direction somehow - maybe on page 12?

Division of Forestry staff

360. Great idea.

Division of Forestry staff

361. The education in invasive species identification needs improving. For example, if you work in an area where there is very little or no communities of a certain invasive plant species, it is difficult to be confident in identification. When a person is involved with the management/removal of an invasive species, that person becomes much better at identifying the species. For example, after spending 2-3 hours pulling garlic mustard you become much more aware of what it looks like.

Division of Forestry staff

362. Agree.

Division of Forestry staff

PUBLIC COMMENTS

363. Agree. Web page should be expanded to provide a diagnostic tool that forest landowners can use to identify and to resolve common forest pest questions. Perhaps this could be a cooperative project for several Lake States with common forest habitats.

M. Luedeke

364. The last sentence in the introduction, "...the need for professional forestry assistance increases.", is exactly right. The DNR Strategic Direction should be to get all of the foresters it can out on the ground helping private land owners. It seems that most government agencies and often businesses keep excessive overhead even when times are tough. The DNR should squeeze all of the office foresters it can out into the field. Have less checkers checking the checkers and more doing. As I said before, forestry is an on-the-ground profession.

Agree. I believe there could be more done to get the average persons attention about the problems associated with invasives and how the public can help mitigate the problems.

...

Again, the Brule Forest as an example. If I understand the organization correctly the field sale preparation work is done by a temporary forester employee. His work is checked by an FTE who may find things to go back to the field and correct. Put the checker in the field doing it properly from the start and save doing some things over and saving the cost of the temporary.

N. Paulson

365. However in FH-4 we believe its time to be more aggressive with enforcement and efforts to curtail introduction and the spread of woodland invasives. We recommend the shifting in FH-4 to reflect that.

L Hanson, WWOA

NURSERIES (N)

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.

DNR STAFF COMMENTS

366. I'd like to know why tree improvement part is separate from Nurseries and placed in Cross-Program Activities. As mentioned, tree improvement part was closely linked to nurseries historically. Staff from Nursery program and Tree improvement program have worked together in some projects and Avery's position was to work as a key liaison to keep these programs close. It was mentioned that the new message for Nurseries will be that the nurseries are not just providing seedlings, but also monitoring tree planting projects. Why not including "working on improving the quality of trees under changing environmental conditions" to the direction of Nurseries? Tree improvement part will be a great niche for Nursery program. This is clearly something that private nurseries won't be able to provide. Nursery staff are very knowledgeable in the area, and has been and will be a key part of the tree improvement program. Why not including it to Nurseries? It will demonstrate additional values to our state nursery program and additional reason why we should maintain our state nurseries. I believe that now is the time that we should bring the two programs close more than ever, not separating them in our Strategic Direction.

Division of Forestry staff

367. I would have preferred that we use our nursery program as an incentive to encourage reforestation. This could be achieved by taking some of the resources allocated to WFLGP and Invasives and used to fund the nursery program at a higher production level. Then provide free or highly reduced stock costs to landowners that open their land to public hunting or enter into conservation easements or do some other desirable practice.

Division of Forestry staff

368. Supportive of the maintenance of a nursery program is such that at a minimum the state is capable of supporting state and statutory requirements first.

Division of Forestry staff

369. Agree with the role and program maintenance.

Division of Forestry staff

370. Agree with proposed intents.

Division of Forestry staff

371. On page 13 the incorporation and use of the ecological handbook was well done.

Division of Forestry staff

372. I agree we must scale our nursery capacity to the overall demand for seedlings. Otherwise, the cost of seedlings from the State Nurseries will become too high. Is 5-8 million the correct number? Keeping a 2 nursery system would allow production rates of more like 6-12 million.

The SD is missing a great opportunity to capitalize on our State Nursery assets! Reforestation needs and techniques are changing, and have been for quite awhile. We no longer need or want to plant 8 million red pine seedlings. Reforestation sites and the species planted are much more diverse and often involve restoration of difficult areas (e.g., bottomland hardwoods, enhancement plantings in existing forest cover).

New pressures on our forest systems are currently increasing these reforestation challenges and the pressures will only be greater in the future (e.g., invasive impacts like EAB, climate change, new diseases like annosum and diplodia). Our

nurseries need to increase their flexibility to grow multiple native species (testing and growing species we traditionally have not grown). Our nurseries need to diversify the type of stock that is offered to include bareroot, containerized, and large stock. Containerized nursery science has improved greatly and is becoming more the norm for the growing of reforestation plants. We should not be forced to ignore the new technologies that are available to us because we do not want to impede the private sector. Wisconsin has very little containerized stock capacity. Most of this stock is coming from Canada and these companies are only interested in growing large numbers of a few species, not the diversity of stock we need for sustainable management here. Containerized also gives us the capacity to efficiently utilize seed of known and improved genetics, which has been indicated as an important area of consideration elsewhere in the SD. Our State Nurseries of the future should be... Smaller, Diversified, Modern/Cutting-Edge, and Flexible to grow whatever plant material needs the state has in the future! The private sector nurseries in Wisconsin are not positioned to fill this niche.

I agree with increased investment in the reforestation monitoring. I would like to also see this increased to monitoring of natural regeneration. Our nursery staff has the expertise to collect statistically sound monitoring data on both artificial and natural regeneration on a statewide basis. This can improve our silvicultural systems to ensure proper green-up and more sustainable management. Individual foresters can and do monitor the results of treatments in their area, but they often do not do this systematically and do not have the ability to compare data and results statewide.

Division of Forestry staff

373. A reduction in Nursery operations is needed. The most in-efficient Nursery should be closed.

Division of Forestry staff

374. I disagree with this proposal. The proposed change here is no change at all. The nursery program is already at 5-8 million. This does not reflect a scaling back of the program. In fact, the program could be scaled down to 1 million seedlings but there would be no significant savings (if any) until staff is reduced, or properties are sold. As long as there are 15-18 FTEs in the program, and 3 facilities to maintain across the state, the cost of operation will remain the same even if you're growing and distributing out of only one nursery. Additionally, increasing the reforestation monitoring program, as suggested in the document, will add a cost to the program and to the Division's budget. According to the pie chart, the nursery program will go from 5% of the overall budget down to 4%. If nursery production is maintained at current levels (again, not scaling down to 5-8 million, but maintaining its current level of 5-8 million) and increasing its financial requirement on monitoring, this leads to a net increase not a decrease. That's a 50% discrepancy as far as I see it (from 5% (current level of overall budget) up to 6% rather than 5% down to 4%).

If nursery staff and facility become more integrated with the genetics program (implications of expanding this program), then the cost of staff and facilities could be better justified and, more importantly, better utilized.

Division of Forestry staff

375. Although I can't argue with the fact that reforestation activities have declined statewide I don't know that the decline can be attributed solely to the reasons outlined in the Challenges and Opportunities section. Speaking directly to my local situation, reforestation efforts have most likely declined because of the amount of past reforestation that has taken place. Natural regeneration of many timber types coupled with past tree planting has simply resulted in fewer acres to plant. I certainly agree with scaling production to meet reforestation needs (N-1) as well as monitoring successes, identifying problems and researching solutions related to reforestation challenges.

Division of Forestry staff

376. General comment about the nursery program. This portion of the forestry division is most run like a private competitive business. It is very important and necessary for the nurseries to stay up with the market demands. Utilization and marketing should be working with this program.

The nurseries also play a large and important role in the natural regeneration concerns that many foresters have issues with. The nursery staff should be allowed to help with these concerns whether it is facilitating educational seminars or providing time in establishing a planting program on the landscape. Provide assistance in the natural regeneration of species of concern outside the nursery on state or private lands.

Division of Forestry staff

377. I'm not sure how well a state nursery/private nursery partnership to meet stock demand will work when one is grown at the cost of production and another is grown for profit. If we project our production based on private nursery inventory the "high quality seedling" issue is important. Who will insure the private stock meets this standard of seedling quality not only in terms of physical characteristics but also but also genetically, i.e. suitable native seed sources?

Division of Forestry staff

378. The BWM agrees with the general direction and purpose of the Nursery system. We'd encourage the Division of Forestry to commit to the idea that there are certain areas of the state that are a higher priority for reforestation than others. While ultimately it is up to private landowners to decide how to manage their lands, it would be productive if we shared a common vision for where to manage for forests in Wisconsin (see additional comments below in PF). We echo the concerns expressed in the Bureau of Endangered Resources comments that there are places where prairie, savanna and restored grasslands have higher ecological value on public-private lands than native or non-native forest types. Reducing the amount of Red Pine seedlings available in areas outside of its native range may also help to meet your reduced production goals in certain landscapes and work towards your strategic direction.

DNR staff (non-Forestry)

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

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

...

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

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

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

DNR staff (non-Forestry)

380. We support an increased effort to monitor tree-planting projects. The impacts of deer browse and long-term viability of many planting projects will undoubtedly be part of this evaluation.

Generally we support the proposed re-evaluation of the nursery market and statewide reforestation needs. This presents the opportunity to focus material support where it can help reduce forest fragmentation on appropriate ecological landscapes, as stated in Forest Strategy 1. Likewise, this presents the opportunity to encourage alternatives to tree planting on our grassland/savanna ecological landscapes, also consistent with the Forest Strategy.

Division of Forestry staff

PUBLIC COMMENTS

381. The state nursery program has an enormous impact on private landowners. We expect that federal budgets and as a result programs in the farm bill will have an impact on seedling sales.

L Hanson, WWOA,

382. Agree with the role and proposed change – makes sense.

G. Rebman, USDA-NRCS

383. In the Nurseries section of the document we suggest a change in the fifth sentence of the fourth paragraph; we believe it is impossible to know "exactly" what the demand is for seedlings.

J. Severt, Wisconsin County Forests Association

N-1

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

DNR STAFF COMMENTS

384. Continue work on the private sector need as related to reforestation only. The current trend over the last 10 years is away from afforestation and appears will continue. Even if it does not, the business plan for the nurseries are to provide genetically sound stock at break even to slight profit margin. Production #'s need to be according to the business plan and not focused on trying to increase or decrease numbers to provide seedlings for everyone in the state. Nurseries should have a very narrow view of the kind, type, number that is produced each year. They should also look at niches to support other program roles, e.g. urban canopy coverage goal.

Division of Forestry staff

385. With respect to scaling production I agree a change is warranted. I would like to see additional wording that would open discussion more specifically mentioning containerized seedlings and providing seed to encourage seeding operations and natural regeneration techniques.

Division of Forestry staff

386. State should continue to look at ways to encourage planting which may result in exploring issues such as reducing minimum order size to 500. State should also recognize loss of large private customers such as paper companies that no longer have industrial tree farm programs in the state end thus are no longer using the commodity. Efforts also should continue to be made to mitigate the economic disadvantage of growing trees, whether it is through taxation or deferred taxation or the creation of forest enterprise zones where reforestation is treated as business, and the further economic costs of long-term investment and infrequent revenues offsets.

Division of Forestry staff

387. Agree

Division of Forestry staff

388. N-1, N-2 Agree. I'm particularly glad to see the emphasis being placed on monitoring and improved genetics. I would also suggest that the nurseries program should also invest more time on the overall forestry education and outreach programs.

Division of Forestry staff

389. On page 14 the proposed change doesn't provide a relative number as far as seedling production - i.e. this is a reduction from or at peak output we produced X number of seedlings.

Division of Forestry staff

390. My other comment is with regard the degree of scaling the nursery program needs to do. I agree that we do need to scale production levels to meet demand. I think though it needs to be slightly higher. I would recommend 6 to 10 million. Our lower year so far was 2010 at 7.6 million. 2009 and 2008 were 8.5 million and 12 million respectively. Both over the proposed production level of 5 to 8 million and 2010 very near it.

Division of Forestry staff

391. To scale production (whatever that means as far as facilities) to 5-8 million seedlings without first knowing what the market or capacity of private nurseries is seems to be rushing to a conclusion based on speculation. The nurseries strive to operate on a break-even basis which was done in 2010 if the 3 cent surcharge (which is an artificial cost designed to increase seedling prices) is not considered. Since most of the nursery facilities are paid for, does it not make sense to maintain all three at reduced production levels and reduce staffing according to production needs? This maintains the knowledge and skill base, distribution system, a nursery presence throughout the state, and the option to increase or decrease production as needed.

The private nurseries located within Wisconsin have been given opportunities to expand into the market that the state nurseries have traditionally occupied. State nursery staff has made an effort to share production information, customer lists, and even traded seed with private nursery operators. However, their collective capacity has remained stable or declined because of high production costs versus the market variability, their need to make a profit, and the fact that most or all are family-run operations dependant on the health and needs of an individual.

Other “private growers” who sell stock comparable to that grown by the state nurseries in fact import that stock from out of state or out of the country. This in effect, moves jobs and revenue out of Wisconsin, and also removes a level of assurance that the stock is genetically suited to this state.

I would suggest retargeting state nursery production from supplying high-cost high-value large hardwoods and conifers used essentially for non-forestry applications to smaller stock (both bare root and container grown) that can be easily planted on forest sites. Provide assistance to landowners in both planning and cost sharing and strongly emphasize site preparation and maintenance as essential keys to establishing these seedlings the first time planted. Use less permanent staff and more LTEs and/or contract labor to meet production needs and use better market prediction models to plan seeding levels thus avoiding the need to destroy unsold stock. The 3 cent per tree surcharge should be removed (or changed to a percentage of the seedlings cost to produce) unless it is used to promote tree planting and reforestation. These changes should not require a change of funding but funding requirements may rise or fall dependant on stock sales.

Division of Forestry staff

392. These nurseries can be run by the private sector.

Division of Forestry staff

393. The maintenance of current program operation and the reduction of production is understandable and I support it. I hope that for the local economy of Hayward something can be done to keep the nursery here operating at least a minimalistic level. We would lose some great employees if it is to be completely shut down.

Division of Forestry staff

394. Agree.

Division of Forestry staff

PUBLIC COMMENTS

395. Wisconsin has a long, proud history of state nursery operations. It benefits forestry interests – and thus all of the state – whether they are individuals, stewards of private, non-industrial woodlands, forest products companies, counties, or students observing Arbor Day. To be candid, the Paper Council does not presume to know what the most cost-effective and beneficial output (N-1) of the state’s nurseries should be. But, we believe that there should be continuing analysis to determine what the most cost beneficial balance is between the production of seedlings by public and private sectors. In that regard, an independent study, with recommendations, on privatization would be helpful.

E. Gustafson, Wis. Paper Council

396. Most of the work of the state nurseries would be better and more efficiently done by letting long term, well supervised contracts to commercial wholesale nurseries within the state. There may be a place for state nursery production of rare or hard to propagate native species, but it makes little sense to me for them to produce large quantities of routine forest species. (N1,2) A. Ode, Bayfield, WI

Strongly agree, with a priority to assure vigorous, fairly priced seedlings or bulk seed taken from Wisconsin genotypes for public forest land reforestation (State, County Forests, townships, school districts, etc). Especially important to maintain nursery capacity in close proximity to where reforestation activities are highest and not import stock from distant nurseries. Give priority to development of more effective planting methods such as containerized stock which improves establishment success and extends planting seasons beyond past practices. Shift sales of small seedling orders to private nursery sector where expense and profit margins better match landowner willingness to pay. Small orders are not as sensitive to price as large orders. Give more emphasis to documenting and informing forest landowners of natural regeneration methods which have displaced some seedling planting practices.

M. Luedeke

397. WWOA believes we should retain the present program but scale production to need (N-1) while modernizing the operation to meet the present demand.

L Hanson, WWOA,

N-2

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)

DNR STAFF COMMENTS

398. Over the next five year, I believe nursery staff monitoring the success/failure of seedlings is an appropriate initial step for the WDNR to become the lead agency in determining appropriate seed sources for Wisconsin's forests during a changing climate. Either the USFS or the WDNR must take this lead. There will be a need for it - I feel it already.

Division of Forestry staff

399. An increase in monitoring/documenting planting success is a good idea. I am not sure if the most basic level of monitoring is best achieved through the nursery program. I think that increasing resources and focus in each specific program that coordinates planting would be the first step. That is County forests, state forests, private forest program should be doing the actual field work of assessing/documenting planting success.

Division of Forestry staff

400. I think tree improvement was moved out of the nursery program for presentation purposes because it is bigger than just a tool within the nursery program and FLT just wanted to make that point, but in reality it is still part of that overall program that is good. I think tree improvement needs to continue to interact directly with the nursery program. In the past the tree improvement position was the nursery coordinator as well. That worked well. Not to say that could not change and have it in 2 positions but it should work directly with nursery managers in planning.

Division of Forestry staff

401. An increase in this program is not necessary given the reduced sales numbers for state produced seedlings as there are fewer sites that meet inspection criteria. An increase of inspections of sites planted with private stock (which is desirable) is unlikely given that private growers are unlikely to provide information on the provenance of their stock or their customers.

Division of Forestry staff

402. I have always felt that the DOF tree planting monitoring program fell short, especially on cost share plantings that depend on more tax payer dollars. I believe field foresters can partner with the nurseries to get this done and share information on problems/successes.

Division of Forestry staff

403. I like both the Nursery proposals and find the need to field test potential solutions to tree planting problems (N-2) essential if we are to convince folks to invest in significant plantings.

Division of Forestry staff

404. I believe further utilizing the nursery staff expertise to monitor tree planting projects is excellent. By centralizing information, problems, and solutions less repetitive work will be done in the field by each field forester and staff.

Division of Forestry staff

405. ...question regarding increasing the monitoring program - Currently the program tracks parcels of certain acreage size based on our nursery sales information. If more sold seedlings come from private nurseries how can we adequately monitor these parcels if the private nurseries won't provide their data.

Question: How do we evaluate the role of the state and private nurseries to meet the overall statewide demand for reforestation needs and the capacity if private nurseries will not share their information?

DNR staff (non-Forestry)

406. I think an important issue that is overlooked and could possibly be incorporated with the nursery program is inadequate natural regeneration. There are landscape issues preventing natural regeneration such as sedge, ironwood, musclewood, etc. Some areas that do not naturally regenerate cannot be explained and solutions are needed. N-2 could include natural regeneration issues.

Division of Forestry staff

407. I have noticed this has already begun but much better communication on how and who and when needs to happen. Better sharing of data. Example I need to check a CRP plantation or MFL or WFLGP cost shared plantation for it successful implementation and maintenance. I find out after having gone out there myself—someone else from the DNR was just out here....This is unnecessary waste---goes to GOOD COMMUNICATION. So either tell me the parameters the nursery is measuring and I can take the data. Or provide the who what when where & results of the check and save the local forester a trip---consult with local foresters maybe there is an data item that the nursery folks can gather that can save someone a trip.

Division of Forestry staff

408. Agree.

Division of Forestry staff

PUBLIC COMMENTS

409. The investment in a monitoring program (N-2) is appropriately part of the puzzle to assure that Wisconsin's need for seedlings is met in the most economically efficient manner.

E. Gustafson, Wis. Paper Council

410. Don't agree with increasing the investment in monitoring tree planting. With declining planting occurrence, it doesn't make sense to increase monitoring on a shrinking activity. Some monitoring is valuable to keep nursery staff aware of field problems but an increase is not warranted. Instead, shift some of the existing monitoring effort to resolve deer browsing impacts, improve seedling survival through development of containerized seedlings, developing improved seed sources of native tree species, updating the herbicide guidance for reforestation practices, and conducting trials of non-native forest tree species that are projected to become suitable for Wisconsin's changing climate.

M. Luedeke

411. N-2 support greater monitoring tree planting projects. We do not believe that is necessary since it's in the best interest of landowners to do it right with their investment.

L Hanson, WWOA

PRIVATELY OWNED FOREST LANDS (PF)

ROLE 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.

DNR STAFF COMMENTS

412. This direction assumes private sector professionals (cooperating foresters) will be completing a large majority of the work that needs to get done while reality is there are quite a few landowners who, contrary to advice given, do not hire a forester. I do understand that cooperators are becoming more capable and doing a larger amount of the work load each year. Looking at what I do in Wausaukee, I have a hard time seeing where I can cut back on tax law work and still see a quality product. Items such as plan review (already streamlined to a point where quality has been affected), plantrac, cutting notices, transfers, letters are things foresters do so often that we accomplish these items very quickly. I reuse old letters so I just need to change the name, address. This can't get any faster. The mandatory practice letters are very efficient, transfers only take time as it deals with making sure the landowner has everything and it is done correctly, the paper work is fast. Wisfirs will save some time by having cooperators being able to view the information. The meat of time spent on MFL is field checking cutting notices, practices to see if they are due, checking active timber sales, and updating recon and finally updating plans. The field work can not be cut back without sacrificing quality and I don't see how much of the paper work can be streamlined anymore where it saves much time. So this direction sounds good but I don't see how on the ground this can be accomplished without sacrificing quality. In our area we limit the field visits as much as we can without sacrificing quality. If we limit it anymore then quality is lost. Managed Forest Law properties get a tax break for good forestry practices and sustainable forestry can not be compromised on these lands.

Division of Forestry staff

413. This is good depending upon how it is done. Example: Eliminate plans and go back to management schedules. The revised cutting notice was supposed to get us in this direction by requiring almost a full blown plan to have a harvest. The cost and time involved in writing a plan that will only be changed as soon as the harvest is initiated is not efficient and not a good ROI. If a landowner really wants a full plan, we still can write those (stewardship plans). If not done correctly though, will create problems (private oversight of a gov. program.)

Division of Forestry staff

414. We have systematically handed this program off to consultants. The primary problem this has created is that the DNR Forester is no longer the "expert" on the landscape. "Thanks for stopping in to see me. Though I am a forester with x years of experience, what you really need to do is hire an expert in the private sector to help you. Here are some nicely colored pamphlets." In regards to reaching out to the non-tax law landowner, that huge throng of people owning much of the land base, I believe we have been trying forever to get to them; weekend landowner conferences, mailings, etc. None have been successful. The only carrot is the tax law. Good luck on that one, I think we'll spin our wheels and get very little bang for our buck. Finally, allow DNR foresters to work on their own time. It would be so very easy to define the constraints a DNR forester must follow in order to work on the side. Take me for example. Let's say the parameter is that I must make all contacts on my own time, I cannot use any DNR equipment, etc. Guess what, I would be knocking out a boatload of Lincoln County's backlog problem on weekends to help pay for my children's cell-phone bills and maybe college. A forester violates the parameters, they get disciplinary action. This is another supervisory issue, at best. We are missing a huge work-force to get more management on the landscape from worry of "conflict of interest". Properly supervised, this would not be a problem. Screw up, you're done. Not that hard.

Division of Forestry staff

415. We need to maintain our credibility and integrity in this program and I really do not believe we should get out of the business of doing plans/timber sale work etc. by handing off more and more to consultants and becoming the

mouthpiece behind a chair. Partner the private education with WWOA, UW etc.. Quite frankly this has been going on for decades too, however, you can't make landowners interested if they don't want to be, no matter how much education you shower them with.

Division of Forestry staff

416. Where to begin. First, having participated in the private forestry bucket team that the bucket team results are not that readily apparent in the strategic direction (except maybe at the 50% level). Having looked at all the programs it was apparent that the private forestry bucket team results were ignored or private was implemented at the 50% level and other functions at higher funding level. Next let me say that it is nearly impossible to comment on these points because they are so general as to render comment impractical. Since I am impractical or have the illusion that my comments may make a difference I will push forward and comment anyway.

Division of Forestry staff

417. Disagree with our role. Agree with the proposed change on MFL efficiencies, conservation easements and PNIF landowner incentives (conditionally). Strongly disagree with CPWs writing industrial transfer plans, disagree with increased effort with new PNIF landowners.

...

Disagree with our role. We should be the initial contact with new landowners, including tax law plan writing EXCEPT where our capabilities are exceeded by demand - then hire CPWs. This should be our defined role - like it used to be. Let cooperators fill other needed roles, like tax timber sales, but this won't happen because these are not the "gravity trains" tax law plans are for them - much money for little work.

Reduce emphasis on tax law admin to reach the great "unwashed". You gotta be kidding me! With these template generic plans in MFL, all administrative emphasis has now been placed on the Cutting Notice. We don't do the plans now so we don't know the property. We have to spend more time now than we used to now at the Notice level just to be sure of correct silviculture, etc. The great "unwashed"? An add on like this at such an austere time? This should not happen now. My experience is that a great percentage of these landowners will not be reached no matter how much time or resource we spend on them. They want what they have and don't care about the future if it means cutting trees.

Division of Forestry staff

418. Overall there is reserved support in the Division of Forestry's role in private forestry. There is support in reducing the administration time associated with the forest tax programs and efficiencies should be implemented where feasible. There is also support for reaching landowners who are not receiving any profession assistance but there is question as to the priority of this and whether or not there has been any demonstrated change in percentage in this segment of the forested population.

Division of Forestry staff

419. Yes to increasing flexibility and efficiency in delivery of service. Create options for the public where possible, but maintain a functional level of service at the same time. Caution – even the appearance of taking some things away is very negatively received by the public.

Division of Forestry staff

420. A proposed change is to try to reach out to new forest landowners. Although perhaps a good idea, do we have the ability (manpower or time) to do this. We've been pulling away from doing this or been restricted from helping directly due to other obligations or budget. I don't see the present workload getting less with several additional things getting added ie. Supervising easements (next proposed change) or getting financial assistance to unhelped landowners (need to set this up or provide oversight) etc.

Division of Forestry staff

421. Disagree with our role. We should be the initial contact with new landowners, including tax law plan writing EXCEPT where our capabilities are exceeded by demand - then hire CPWs. This should be our defined role - like it used to be. Let cooperators fill other needed roles, like tax timber sales, but this won't happen because these are not the "gravity trains" tax law plans are for them - much money for little work.

422. Reduce emphasis on tax law admin to reach the great "unwashed". You gotta be kidding me! With these template generic plans in MFL, all administrative emphasis has now been placed on the Cutting Notice. We don't do the plans now so we don't know the property. We have to spend more time now than we used to now at the Notice level just to be sure of correct silviculture, etc. The great "unwashed"? An add on like this at such an austere time? This should not happen now. My experience is that a great percentage of these landowners will not be reached no matter how much time or resource we spend on them. They want what they have and don't care about the future if it means cutting trees.

Division of Forestry staff

423. 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.

424. I feel this role fits well with the Private Forestry Mission approved by FLT in August 2009 (MISSION (PURPOSE): To work in partnership to promote and support Wisconsin's privately owned forests and its sustainable management.). The statement "landowners who currently do not receive any professional assistance" should not be narrowly defined to be only landowners who have never received services but must include those who cannot find the assistance in the private sector to take them to the next step.

There is always the fear that the DNR Foresters will not be able to maintain their ability to provide quality services because of the lack of practice. The ability to mark timber and write plans improves with every job they do. They develop a better understanding of how to implement the guidance we direct private foresters to use. I am not saying that the DNR Foresters should be doing massive numbers of plans and marking just that the experience can give the DNR Foresters some credibility when they are telling/communicating to the private sector a problem with the work. On the operation side working together on some jobs can go a long way to understanding and building a professional relationship – this takes time but can reduce time needed in enforcing the Cooperating Forester Program and MFL program.

Division of Forestry staff

425. I do not see where we will gain large chunks of time through efficiencies in the MFL program. The shift in plan writing services was a big savings, but besides that the time we spend on tax law seems to have only increased.

Limited cooperating foresters in our part of the state and most only want to do the more profitable work of MFL plan writing. Difficult to find consultants that want to set up timber sales, especially the many marginally commercial sales that we have as mandatory practices. Statistically we are about 1/3 consultant sales and 2/3 logger sales in my area. How do we build capacity? Hmmmm.

I agree with the goal to target less engaged forest landowners. Most foresters love to spend time with new landowners. How do we get those people engaged is the difficult part.

Cost sharing assistance... it makes me uneasy to direct cost sharing away from those who do not receive professional assistance (i.e., away from MFL owners). MFL often gets landowners in the door and gets them a plan for their property. The cost sharing is often the incentive for them to carry out the non-commercial practices that are important for sustainability. Example, tsi work to increase oak regen. I agree maybe there could be some type of special incentive for new landowners, without cutting off the others from cost sharing assistance. Example, increase cost share rate for new landowners.

Division of Forestry staff

426. Bringing statewide consistency to the Private Forestry and Fire Programs should be a point of emphasis of Strategic Direction in order to save taxpayer dollars (Fire Program) and provide consistent services to landowners (Private Forestry Program).

There needs to be heightened emphasis in the private forestry program on consistency in the methods and level of service we deliver across the state. For instance, why are DNR forester in some areas of the state accomplishing private forestry timber sale practices efficiently by embracing the consultant forestry system, while other DNR foresters continue to use our DNR workforce to establish sales, which is much more labor intensive and costly to the state.

...

Do private forest landowners implement forestry practices on their lands without the guidance of a professional because of a lack of DNR investment? Or do they implement forestry practices on their lands without professional guidance because that is just their preference, even when affordable professional advice is readily available? Should we increase investment in this area of private forestry without first verifying that the un-served customers are interested in our DNR services or the services of a consultant forester?

Division of Forestry staff

427. I disagree with the overall proposal. This program accounts for 21% of the budget and is planning to be reduced down to 20%. I don't disagree with this reduction however, the intent statements indicate 1) additional efficiencies (is this a reduction or an increase in cost?), 2) increase efforts, 3) increase investment, 4) increased investment, again, 5) maintain the level. It seems as though the overall effect of these intent statements is an increase in cost, not a reduction. I can't make any suggestions here because I agree with the overall budgetary outcome (21% down to 20%).

Division of Forestry staff

428. Although "reaching (other) landowners.." is a laudable goal and I meet with numerous "great unwashed" people every year, how can you reduce tax law administration? There seems to be a perception (not from field staff) that by farming MFL work to CPWs and consultants, the MFL program will progress smoothly, and DNR Foresters will have more time to devote to State lands.

The reality is that for the private sector, "time is money". I work with many good consultants and loggers, but I spend a great deal of time "fixing" marginal work on MFL properties done by folks who "may not have high standards" (how's that for a euphemism?).

Thus, if the State is giving landowners lower property taxes on sometimes marginal, forested hunting land, the State has an obligation to the taxpayers to ensure "quality control". In my opinion, this is one of my most important roles as a DNR Forester. Again, although there are many good consultants and loggers, there are a few bad apples and the State should not allow "the fox to watch the hen house" especially when taxpayer money is subsidizing a program!

This morning I spoke with a CPW who is writing a new MFL plan for marsh grass. Do you think I should field check this property before rubber stamping the plan? This same landowner has been cutting his 1990s "practices due" for a couple decades! Will CPWs ensure that he follows through before he re-enrolls his other partially cut properties next year? CPWs are making good money writing new plans for this guy.

The above example is not an isolated situation. As of January 1st, I have about 3000 acres on my MFL "Practices Due" list, and 2300 acres on my "Practices Established" list. I have about 25,000 acres in MFL in my two counties, and about 25,000 acres of State lands. There are two vacancies in my office and tree planting season and CRP sign-up are closely approaching. Did I mention the stacks of Cutting Notices/Reports, WFLGP applications for CPW MFL plans, MFL transfers, and other tax law paperwork piled in my cubicle?

Thank God our goal is "to reduce emphasis on administering the state's forest tax program" rather than filling Private Lands Forester positions!

Division of Forestry staff

429. DNR has been at this for a long time. Currently we concentrate our efforts on those enrolled in a tax incentive program, such as the FCL or MFL programs. Clearly there have been a significant number of private landowners reached within the last decade. Focusing on those not enrolled in MFL is a fine idea, one that we used to pursue more aggressively prior to the huge influx of MFL entries in the late 1990's and early part of 2000. I simply don't know how successful we can be. Landowner workshops have been marginally successful in the past, with many attending landowners already enrolled in a forest based tax incentive program or attending in order to enroll in a program and reduce their property taxes. Limiting our involvement with timber sale establishment on private lands probably didn't help when it comes to reaching landowners not enrolled in tax incentive programs. Private organizations, like WWOA certainly help spread the forestry message and it is important for them to continue those efforts. Basin educators also play an important role in this effort and should continue reach out to private landowners. Based on a recent workshop in Langlade County 17 landowners attended the initial woodlands management class. I understand about 30 landowners attended the Lincoln

County initial session. About 15% of the landowners attending the Langlade County session are already in MFL. I optimistically believe there is an opportunity to enhance the experience of those attending the initial sessions by holding a field day on state owned lands in the county coordinated by local DNR staff. The attendee list would be used to contact those individuals and survey them to determine if a field session would be worthwhile. In addition we would invite landowners who contacted us via email, potentially include landowners who have attended industry workshops as well as publicize the event through local agencies. If cooperating consultant foresters would like to be involved I would certainly welcome their assistance. I clearly understand this would require a time commitment as well as a minimal financial investment, but if we want to reach additional forest landowners we will need to make that commitment.

So what do we cut or change in order to increase our involvement here? Let's start with the WFLGP program. In my opinion there is absolutely no reason we should be cost sharing plans for entry into the MFL program. The financial incentives for enrolling in the MFL program should stand alone, no additional entitlement incentive needed. A thorough analysis of the WFLGP program should occur to determine whether our investment is critical to landowners performing forestry and wildlife related activities on their properties. In general terms it has been my experience that if landowners want to enroll in the MFL program they will do so regardless of cost incentives that may be available. They will also plant trees and perform other activities in most cases without financial assistance. What about prioritizing cost sharing for stewardship plans that aren't MFL entry plans? Whether DNR would write free plans or charge and cost share plans isn't clear to me, but it may be something to think about.

Expanding and continually updating our website to emphasize that DNR foresters can help with forestry assistance for those not interested in MFL is important. Perhaps logging contractors can also help, oftentimes they might be an initial contact for a private landowner and implementing some type of referral program might be one alternative to consider. This could tie in nicely with the master logging certification.

Division of Forestry staff

430. We need to evaluate the down side as well as the up side of privatization when determining what roles are conducive or not for the private sector. For the DNR field forester who delivers services and interfaces with the public on a daily basis, there have been costs. Rewarding parts of their jobs have been shifted away. They may be approving shifted work at a quality level lower than they did themselves. Relationships with landowners have been distanced by third party referrals. The perception is out there that they do less work. For newer foresters, they are put in the position of evaluating and approving work they have little or no experience doing themselves. The approval process for some work has exceeded the time they could have done it themselves. The list goes on & the results are evident in the Cultural Survey.

The litmus test of reduction in administering the tax law program is it better not sacrifice program integrity/quality. It is a nationally significant program worthy of the administration time needed to keep it running well. I've seen efficiency decisions made in this program where there was collateral damage to quality.

An in depth effort to reach private landowners is an important goal. Key to its success is the Divisions willingness to seek out and hire expert help in determining what % of these people are realistically reachable and what approach is most effective. If possible, it would be nice to be able to target those people most susceptible to mismanagement first and graduate to those less likely to manage at all, later. For generations there have been cash flashing timber bandits in WI effective in putting timber on the market while mistreating landowners and/or the forest in the process. With little in the way of regulation they are slippery enough to stay in business over time. I'm convinced some of their clients were destined to get what they deserved but for others, they were hurt and embarrassed by the experience. We need to minimize these repeat stories.

For some of the unsubscribed, the importance of reaching these people is motivating them to act, period. For others, it is motivating them to act in a different fashion that is conducive to sustainable forestry. I think we will need to rethink policies in delivering service to the unsubscribed to take advantage of windows of opportunity and landowner motivations and insure sustainable forestry happens on the ground in lieu of a bad alternative.

Division of Forestry staff

431. Recent changes to the format of Tax Law Management Plans the development of a detailed cutting notices makes administration of the tax law program even more critical. Department foresters are becoming even more removed from knowing the lands and the landowners that they are administering. I think that sound forestry sells itself and is the

best billboard for landowners who are not currently utilizing the services of a professional forester. The department can do a better job of communicating to people that forest management can help enhance their property and accelerate the rate at which they can achieve their specific forest goals. With forest certification, green tree retention, identifying / managing invasive species and implementing BMPs for water quality, it would seem to be in the best interest of Wisconsin's Forests, the landowners and those who benefit from Wisconsin forests to have more eyes on the ground. Developing better relationships between DNR foresters and private foresters and focusing on creating opportunities to implement property level management schemes that fit in with landscape scale objectives can be enhanced. There should be more emphasis on getting DNR and private foresters in the woods with forest landowners (all together) at some time during the time of sale establishment, during an active sale or post sale to set direction for the future of the stand.

I've come to be more conscious of the fact that the forests don't need us to show them how to grow, foresters only manage trees because people have a vested interest in the forest resource. It's the people that help set the direction and it's the forester's job to help the consumers (recreational users, wood product consumers, preservationists, etc) to help achieve the goals by managing actively or determining where passive management is appropriate. The focus needs to shift from how the forester can help the forest to how the forester can help the people.

Division of Forestry staff

432. The BWM agrees with the direction and importance of private lands to Wisconsin's forest wildlife and economy. We look forward to working with the Division of Forestry in order to help increase the amount of private forest owners who have a management plan that incorporate wildlife and forestry objectives. There are many areas of the state where the BWM and its partners are looking to implement a landscape-scale vision for forests on private lands. Developing this vision will be difficult in an age of increasing parcelization, however; there are models of success that we could build upon (e.g. Kickapoo Cooperative). We are also building capacity with our Farm Bill Biologists for this type of work and we could build upon these models to implement shared landscape goals for forest initiatives. Many landowner surveys indicate the high value of wildlife to private forest owners. A collaborative approach between the BWM and Forestry may likely be a more successful strategy when trying to protect and better manage private forestlands across the state.

DNR staff (non-Forestry)

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

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

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

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

DNR staff (non-Forestry)

434. We strongly support an increased effort to reach the large percentage of private forest owners who receive no professional assistance in caring for their land. This intention recognizes that landscape-scale management of several significant forest landscapes identified in many of our long-term plans will require private landowner awareness and cooperation. To be most effective, it will also require financial incentives. Several proposed actions to help achieve coordinated management of clustered private ownerships are proposed in Forest Strategy 7. We will support this effort and would like to continue providing input on how and where to accomplish it.

Division of Forestry staff

PUBLIC COMMENTS

435. The DNR should not increase effort to reach the “unengaged” landowners. Most of the forest landowners who are unengaged from the DNR choose to be unengaged. UW-Extension and other agencies/organizations are better suited for this effort. The DNR will spend a lot of time and money on this effort with very little benefit. If the Division is to increase its efforts it should do so with education field days where one-on-one contacts between landowners with DNR foresters could be made.

P. Dayton, Vernon Co.

436. Agree with the role and proposed changes and support the Division moving to landscape scale directed assistance. This aligns well with NRCS’s effort to provide conservation planning assistance to landowners based on landscape, watershed and regional concerns.

G. Rebman, USDA-NRCS

437. WWOA concurs in the Division’s role to assist private landowners and fully concurs with PF-1 and PF-2.

L Hanson, WWOA,

438. “The Division is proposing to reduce emphasis on administering the state’s forest tax program...”: While administrative efficiency is desirable, increased “efficiency” cannot be used to justify reduced rigor in MFL program components. Shortcuts that reduce the quality of service provided or threaten the integrity of the MFL system are not efficient in the long run. Based on past experience with MFL, a statement such as this causes concern.

D. Pubanz, Wolf River Forestry

439. However the one comment I would like to make, as someone who owns forest land and has a deep interest in the natural habitat that is available in Wisconsin, is that I especially encourage assistance to small private landowners.

...

But I support the continued assistance to small private landowners. I also think the change in emphasis to landowners who have never received proper advice in managing their forest land is certainly appropriate. My concern is that the small private landowner who has received advice in the past should not be forgotten or ignored. If there are people who have shown an interest and motivation in trying to improve the forest that they currently own, please don't ignore these people. I understand that with limited state funds DNR can not do all things for all people and you are right in picking a strategy and trying to reach those people who have not in the past done anything to manage their woodlands. But I think that there have got to be ways to serve BOTH groups of landowners.

T. Eisele, non-industrial forest owner, Crawford, Co

440. I support the efforts to increase private landowner outreach and effectiveness. However, I am concerned by the statement, "We recognize that there are a large percentage of landowners who do not sustainably manage their forests." I believe this statement to be opinion, and not fact. I am also troubled by the reference to "landscape scale programs" in this section.

S. Kariainen, Louisiana Pacific Corporation

441. I was pleased to see recommendations for: Increasing investment in reaching private landowners not currently managing their lands

J. Solin, UWSP

- With over 350,000 landowners owning 65% of Wisconsin's forests, inspiring and helping landowners become strong stewards of their land is a difficult, yet critical task as the Strategic Direction recognizes. The number of landowners, the myriad issues they face, and shrinking budgets and human capacity necessitate new strategic approaches and partnerships along with an alignment of resources to those approaches and partnerships.

We fully support the Division's proposal to continue to invest in helping landowners manage and protect their forests and to do so by working in partnership with the private sector. The three-pronged emphasis on investing more resources to reach landowners directly, filling roles not conducive to private sector engagement, and focusing on landowners who are not receiving any professional assistance is a sound strategic approach for the Division. We recognize that there is a trade-off in this role by reducing emphasis on administering the state's forest tax program, for example. As important as this program is, we strongly believe the emphasis on direct landowner support is the right strategic guidepost for allocating resources to help private forest owners manage their forests sustainably.

J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

442. In sum, we believe the Strategic Direction's Privately Owned Forests section is a strong framework for guiding and investing Division resources in this important area. And the American Forest Foundation and the Aldo Leopold Foundation look forward to continuing to work in partnership with the DNR and the Division of Forestry to further flesh out and implement these ideas and proposals.

As we do so, we also urge the Division to think beyond the set of proposed changes identified in this important document. As we know from surveys and our own direct experience, the reasons people own their land varies widely and is fast-changing. It is no longer the case that landowners focus first and foremost on traditional timber products. For many, hunting, birding, or simply spending time in a beautiful setting on the weekends with their families is what they think about first. Tools such as MFL, cost-share programs, and conservation easements are likely to always be critical components of helping landowners meet their goals while protecting Wisconsin forests. But new support tools and mechanisms are no doubt needed as well given the changing demographics and needs of today's landowners.

The Division has established the right strategic approach to meet these changing landowner needs and demographics through investment in more direct landowner contact. And by working in close partnership with private organizations also in direct contact with landowners, we can collectively identify and test new ideas to see what is both practical and helpful to landowners while achieving important gains in protecting Wisconsin forests. It is a challenging future, to be sure, but one we believe together we can embrace. J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

Private forestlands provide approximately 65% of the fiber needed by industry. The MFL program provides a tax benefit to those who are enrolled which in turn creates timber management opportunities as well as recreational opportunities for the general public. In a manner of speaking one could say that a land owner sells some of his private property rights in return for a tax break and management guidelines developed by the state in conjunction with certification in many cases. Although DNR currently plays a significant role in the management of MFL, more responsibility could be placed with consulting foresters who have met forest management education requirements. The DNR could play less of role in over site of MFL management allowing more time to be spent on state and county lands.

It is stated that easements are a powerful tool to keep forests as forests. It is GLTPA's opinion that zoning and smart growth plans have already begun restricting the development of private properties which would remove them from forestlands so it is our opinion that the funding level remain the same or be lowered in this area.

H. Schienbeck, Great Lakes Timber Professionals Association

443. I think that private forest landowners could benefit from closer cooperation between DNR Division of Forestry, Natural Resource Conservation Service, UW Extension, and other agencies that are out there dabbling in forestry assistance. I realize that some cooperation does already exist, sometimes at very high levels, but I have also observed instances where parallel programs operated by separate agencies create inefficiency and confusion among landowners.

The best example of this that I can relate to you is the new forest management assistance program that is being offered by the USDA Natural Resource Conservation Service.

Several weeks ago I was setting in my ice fishing tent and paging through the local advertiser paper ("Evergreen Shopper" - the fish weren't biting and I was a bit bored.) and was very surprised to see an ad to private landowners from the Living Forest Cooperative. This ad was informing private landowners that the Coop could provide forest management plans with up to 100% cost sharing to cover the cost and with no mandatory timber harvesting. After reading this I packed up my gear, headed back to shore, and went directly to the NRCS office in Ashland, where I met with District Conservationist Gary Haughn.

Gary was very helpful and told me that the ad was basically correct in that the NRCS program did have funding available for forest management planning. I ask Gary who prepares the management plans and he told me that the plans have to be prepared by foresters who get training and certification from the NRCS. According to Gary, Living Forest Coop is one of only 2 forestry consulting providers in the stand that have gained this certification, and he wished that more foresters would obtain the certification. He added that the process for gaining this certification is rather cumbersome and probably a major reason why more consulting foresters are not interested providing this service.

This, to me, is a prime example of an opportunity where two government agencies (DNR & NRCS) could possibly combine funds that they have available to help private landowners and combine their separate programs into one effort that is more provider and user friendly.

I think that the forest landowner workshops that UWEX has presented during the past year, with considerable assistance from DNR staff is a positive example of the efficiencies and effectiveness that can be gained by coordination and cooperation between government agencies.

T. Salzmann, Sandhill Land Services, LLC

PF-1

<p>Proposed Change: The Division will develop and implement additional efficiencies in the administration of the Managed Forest Law (MFL) program. (PF-1)</p>
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DNR STAFF COMMENTS

444. I pointed out above that there is not a lot of room from my view to improve efficiencies of the program. Transfers, plantrac, letters are so routine that the paper work part of it is already very efficient. The forms can't be much faster to fill out. Like I said, Wisfirs will give cooperators access to info which will save some time but that likely won't save much time. I don't see where else WisFirs can save any appreciable amount of time. (Hopefully I am wrong)

The last efficiency added was the template plan which in my opinion was a big mistake. Yes it saves review time in the office. Lets say it saves me ½ hour per plan (which it is likely less) and I review 16 plans per year. This would save me about 2 days work which is good but the plan is a very poor product, not useful or understandable to the landowner or a logger, only a small section of the plan is tailored to the person's property, the mandatory practices are vague which means more time in the future spent developing more specific harvest instructions (which is very important and makes everything run much smoother), and the plan costs have actually risen even though the plans are easier to write which does not benefit the landowner. (Supply and demand has caused this increase) This change resulted in a poorer quality product that saves some time up front but at a bigger cost. These feelings are shared by many foresters including cooperating foresters. I understand some of the changes were for certification but include that in an appendix or something and get back to an easy to read plan personalized to the landowner's property. I am only pointing out these failures to show that efficiencies must be done wisely. (And maybe I wanted to vent a little as well) The template plan "efficiency" was done with very little input from the field and when I was able to comment my comments fell on deaf ears as it was already a done deal. That experience helped lose forester confidence in Madison and skeptical of any other great "efficiencies" Efficiencies are great but do not sacrifice quality.

Division of Forestry staff

445. Increased efficiency is always good but it should not come at the cost of ensuring sustainable management. Like it or not, consulting foresters and timber buyers need constant checking. Every partner has some of their own interests in mind. DNR foresters work for the interest of the land and not a particular aspect of the ecological, economical, and environmental triangle.

Division of Forestry staff

446. If you plan to privatize (or have no choice) the private forestry program you will need to insure you fulfill the duties to administer the law adequately. To do this you still have to have the authority to conduct strong regulatory oversight and allocate adequate resources (ability) and provide direction to conduct the oversight. To cut oversight and the resources to conduct inspection will again weaken the program.

Bottom line, the private forestry bucket team concluded that MFL was the single most important tool to affect management of private forestry lands in WI. Better than easements, better than reaching the great unwashed, better than consultant foresters. To cut investment in that tool is a step away from affecting management on private lands, and to reallocate to reach more people is an exercise in diminishing returns.

Division of Forestry staff

447. More efficiency is nice, but there are cooperating foresters have no business being allowed to be cooperators. I see the numbers where we have a lot more cooperators, but some of them aren't very good and many are only cooperators because we created a booming business opportunity for them by privatizing MFL plan writing.

Division of Forestry staff

448. Support for MFL to be as efficient as it is effective.

Division of Forestry staff

449. I agree that additional efficiencies are essential to the success/survival of the MFL program. I am not sure if it falls under this heading or not - but I am concerned about pushing too much of what DNR used to do for landowners to the private sector for one simple reason. The more we tell our customers that " we no longer can do X, Y, and Z and you will now need to pay someone else (even if we cost share a portion -- creating at least a 1 year time delay, additional paperwork and administrative expense and still requiring a significant investment) to do it" the more our customers will say... well I guess its not worth it or I plain can't afford it - and less sustainable forest management will be practiced and less enrollees in sustainable programs we will have.

Division of Forestry staff

450. Change to administration of MFL be more efficient sounds great but the devil is in the details. For example the new management plan format was a top down idea that did not turn out to be an improvement or more efficient. So I have concerns about what this means.

Division of Forestry staff

451. Must also seek quality improvements along with efficiencies.

Division of Forestry staff

452. Agree. Efficiencies in the MFL program would be most welcomed and would certainly free up time to work with un-engaged landowners. Consider the elimination of the need for a management plan altogether and focus our efforts on the walk-through, type map and cutting notice. Template plans come at a high cost to the landowner and provide little value to them. A less intensive but more effective CPW tracking and compliance system is needed to go along with this proposed change.

Division of Forestry staff

453. I agree improvements in efficiency are possible particularly with the release of WISFIRS for the private lands, but certain aspects of tax administration will always be time consuming. For example, enforcement actions require more time than the usual amount with a cooperative landowner, but are necessary to insure compliance to the MFL program standards. Getting a un-cooperative landowner removed from the MFL program is a long and time consuming process, which has not always been supported by Central Office. Meaning after gathering the appropriate information and documentation, withdrawal is not always the end result which is de-moralizing to field staff.

Division of Forestry staff

454. A proposed change to make the MFL more efficient seems to be a good idea in theory. Administering the program seems to take a lot of time. However I'm not convinced that putting more responsibility on consultants to handle the program will work, especially if we are trying to hold management to standards (certification). It seems like our present relationship with the consultants and MFL program is to review their work to make sure it is in compliance with the program and meets the standards. I feel like I do a fair amount of correcting to make sure it does. For example with the plan review we are suppose to do a shortened checklist once the consultant had established themselves as doing a good job. I don't know anyone yet they I don't feel I need to review it all and a number I still feel I need to field check. We can hope that will change but we're not there yet and there are always new cpws.

One of the streamlining procedures that was introduced has been the template. I understand the idea behind the template having reviewed plans before and struggled with plan writers to use acceptable language. And perhaps it has met his intended objective to get plans approved and into the program. It however seems to fail in many ways. I read the templates plans and end up with very little understanding of what the property is like. It is so generic that very little of the insight the forester has on managing that individual property is there or how it is meeting the objectives of the landowner or managing any unique aspects on that property or even what they are. There should be some way to capture this in the plan so a person picking it up can use this insight and plan accordingly rather than starting from scratch.

Also there is a proposal to have consultants do the industrial transfers. I think it is important as reviewers of the plans to have experience doing them so we are aware of the challenges and issues that the cpws are dealing with. I think we should all being doing several plans a year so we aren't just foresters on paper. The industrial transfers are an opportunity to do this. We should also be doing several sales a year and preferably some on private lands. Private sales often face different challenges than public land sales.

If there are limited funds for cost-sharing, I suggest removing MFL plans from the cost-sharable list. These plans are obligated by a voluntary program. Most landowners (if open lands) make up the cost of the plan within the first couple of years of the program.

Division of Forestry staff

455. I do think we can increase our efficiencies in administering the tax law programs. Hire more permanent staff instead of LTE's, who seem to get assigned a huge overwhelming workload and who in some instances were not treated very well. The tax unit needs to be enforcers. They need to make quick tough decisions. Delist tax law lands if that is what is needed. Don't be wishy washy and indecisive, or keep giving people "another warning or extension".

Division of Forestry staff

456. Private Forestry Proposed Changes; As stated above I believe the strategic direction for the private forestry program is appropriate and includes the main ideas and areas that the Division should focus on. I do have a few specific comments on the proposals and...

The Division will develop and implement additional efficiencies in the administration of the Managed Forest Law (MFL) program. Comments; This will be difficult but is very important. Developing the quality in our partners and the trust in their ability is a key component.

Division of Forestry staff

457. Disagree with reducing compliance checks. Reducing compliance checks opens the MFL program to attacks that landowners (LO) get a "free" tax break and do not have to do anything. MFL is almost too successful and has continued attacks on it.

Many LO and loggers cheat on the cutting notice to save a few a few \$. Increased law enforcement is needed, not less. Allowing more MFL land closed to public would increase management on the 85% of land that is harvested with out a management plan. Building on a successful program is more efficient than going a different direction.

Division of Forestry staff

458. The MFL program is an excellent program that I was once very proud of. Over the last few years it seems that annual changes are made in the namesake of administration efficiencies. Although this may contradict what I said

earlier about change... changing the program annually is not fixing the problems. I feel we are getting away from the intent of the program and legislatures need to be reminded what that is.

“Encourage the sustainable management of private forest lands for the production of future forest crops through sound forestry practices, recognizing the objectives of individual property owners, compatible recreational uses, watershed protection, development of wildlife habitat, and accessibility of private property to the public for recreational purpose.”

We the Division of Forestry must defend sustainable forest management rather than continually allow the public to tell us how the program should be or the fate of the MFL program will follow the fate of deer management in WI. Allowing the public to manage the resource based on desires for tax reductions is not sustainable forest management. I understand that the public is one of our customers. At the same time we are the experts and must be allowed to practice our profession.

Rather than continually change the MFL program why not make other programs which address other forest values such as forest recreation.

Division of Forestry staff

459. I'm not sure that I understand what 'setting standards that allows for the full range of sustainable practices' means. And having lost trust in Central Office staff to manage this program, I'm skeptical. One recent change in the program to increase efficiency was the template plan. What a disaster. We haven't helped the landowner understand forest management on their property and we aren't saving any time, since we have to start from the ground floor when a mandatory practice is due. We've also lost credibility with landowners.

Division of Forestry staff

460. My comment on this proposed change relates to the partnership between the counties and the state liaison forester. The state forester is in a regulatory role. Foresters need to be out there in the woods marking, establishing, cruising, inventorying the private lands with the cooperating foresters to educate and build a relationship with them that is not regulator but rather leading by example. In order to be an effective leader the DNR forester must have experience in practicing the forestry work. They must have a mentor that has experience practicing forestry work. It is essential to have the experience. The experience must be evaluated by the mentor as pass or fail not just experience.

New foresters do not get this type of experience. They are pushed, rushed into a regulatory role. New foresters are forced to become confident in their regulatory role but they don't have any solid ground to stand on.

Division of Forestry staff

461. I think an efficiency of administration of the MFL program that is needed is DNR foresters need to have experience establishing and administering sales before they can feel confident enough to administer cooperating foresters. Establishing or administering one sale is not sufficient experience. Having the experience will make communication and relationships better with cooperating foresters.

Division of Forestry staff

462. Good to do....but PLEASE do not sacrifice quality of sustainable forestry here—I don't believe C work is acceptable. Yes some of this will come from Wisfirs—so this isn't that new of change...

Division of Forestry staff

463. I understand the push to use cooperating foresters, but we need to maintain a level of DNR forester input in administering MFL/FCL and definitely non-tax landowners. I can certainly see a reduction in the amount of enforcement of the statutes associated with the tax law programs if more and more of the administrative duties are given to cooperating foresters. I do not want to see the tax law programs lose the ability to ensure that landowners, foresters and loggers are following the intent of the programs. I definitely foresee this happening, and it's already happening in areas where DNR foresters' presence is not as strong or attentive to detail of the statutes and administrative code. It is evident to what happens in practice on the ground, and I think more so now with certification being a big issue that DNR foresters need to maintain a strong presence.

Division of Forestry staff

464. The discussion of “clear accountability and protocols for landowners and cooperators to be able to reduce the level of compliance checks” was very general and doesn’t give me much comfort in thinking the intention is to have the landowners determine if the forestry being practiced is appropriate. Going on, the recommendation is still very nebulous: “Proposed Change: The division will develop and implement additional efficiencies in the administration of the Managed Forest Law Program.” If the DNR forester is being redirected not to write management plans and to do less tax law administration we are being pushed into having less input on the management for a program that we are administering and we are still holding landowners accountable to stay within the standards of the program and remain compliant with the side bars of forest certification. We are holding landowners to a higher standard yet we are more hands off with them, but are trying to reach those who haven’t sought assistance. We shouldn’t abandon those landowners who have a vested interest in practicing sound forestry in an attempt to reach some landowners who may not trust that forest management is the right thing for their land, have no interest in the state telling them what they should be doing with their land or those who don’t have an interest in managing a property that they may only visit a couple days a year. We can make an attempt to reach the un-reached, but not at the expense of those who have already committed to following a state approved forest management plan.

Division of Forestry staff

465. I do not know how to respond to this because I do not understand the proposal. What does it mean? Who within the Division will develop and implement these "efficiencies". Or is this just political "speak". I interpret this proposal as a hidden agenda.

Division of Forestry staff

PUBLIC COMMENTS

466. It comes as no surprise that the Privately Owned Forest Lands program is of high importance to the Paper Council; particularly the MFL program. Thus, we are pleased to express general endorsement of the proposals in this section, particularly as they pertain to additional efficiencies in the MFL program (PF-1), and an increasing investment in efforts to reach those private forest landowners who currently receive no professional assistance caring for their land (PF-3 and PF-5).

We do, however, repeat our concern with terms such as “targeted landscape scale management” on page 16. If this means measures to enable small parcels under separate ownership to be group enrolled in the MFL – as was endorsed by the Legislative Council’s Special Committee on Review of the Managed Forest Land Program in recent months – this is viewed as a plus by the Paper Council for the resource, landowners and the DNR. If this is an incorrect understanding, we reiterate the concerns we identified relative to “landscape planning” phrases in our comments above addressing Counties. Within the context of this section on privately owned forest lands, we wish to note that our concern with “landscape level planning” includes its potential to infringe on private property rights.

E. Gustafson, Wis. Paper Council

467. Strongly agree to develop additional efficiencies in administering the MFL program. Existing statutes and administrative rules are complex and have shifted away from the original intent of the forest tax law program. Public perception is that this program offers a shelter or means to avoid paying property taxes which differs from the original intent to offer a tax deferral until income from harvesting would help pay taxes. It appears that some enrollees continue to pursue loopholes to avoid MFL program requirements.

M. Luedeke

468. Agree. Need to add PF-1.5: Develop and implement a more efficient DNR Forestry organization to allow putting more foresters in the field without adding personnel. N. Paulson
“Areas of the program to evaluate will include... setting standards that allows for the full range of sustainable practices, clear accountability and protocols for landowners and cooperators to be able to reduce the level of compliance checks...”: I wholeheartedly endorse the development and enforcement of standards. The current bar for Cooperating Foresters is far too low and does not distinguish them from a non-cooperating consultant. Personally, I favor compliance checks and believe there should be no diminution of DNR's on-site regulation of MFL plans, and MFL and non-MFL forest management activities. If DNR is going to privatize everything, someone has to be an effective regulator, and that is DNR's fundamental role.

D. Pubanz, Wolf River Forestry

469. With the development of WISFIRS, it is hopeful that local DNR foresters will spend less time administering the MFL program and more time targeting landowners who have not yet received professional advice. This is listed as a top priority item in the job description, but has been overshadowed by administration of the MFL program in the past. The private sector is very hopeful that WISFIRS will be the answer to this issue.

K. Quast, Quast Forestry

470. When it comes to managing and protecting private forests, the MFL program is a critical tool and should be maintained. At the same time, much more needs to be done by the Division – indeed by all the groups and organizations working in the private forest arena – to reach and build relationships with more forest owners. Moreover, as successful as it is, the MFL program does not necessarily work for all landowners. Other tools and outreach efforts are needed that recognize that landowners can manage their forests sustainably without doing so through MFL. Therefore, we strongly support the proposed change to identify efficiencies with the MFL program that will free up resources to invest in reaching more landowners directly.

471. We also recognize that one of the reasons the MFL program is a success is its rigorous monitoring system designed to ensure sustainable management is actually carried out by landowners in exchange for the benefit they receive. However, in a time of scarce resources, a balance must be struck between the maintaining the success of the MFL program through enforcement and the need to reach far more landowners. We believe the potential changes identified could strike the right balance between maintaining a credible and effective monitoring system while freeing up resources through greater efficiencies.

J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

472. Anything the Division can do to create efficiencies in the administration of the MFL is a positive. The MFL is a good program. This year I have had the opportunity to see firsthand 25 years of management on MFL lands as I am involved in over 20 renewals of original MFL contracts. The bottom line is the work got done and in most cases with professional forester oversight it got done right. That's refreshing.

What I have noticed as I look over one page management schedules written 25 years ago is that the work that is done today, with 10-15 page management plans, is probably no better than the work that was the result of a one page management schedule 25 years ago. Stands regenerated, quality has improved, wetlands and RMZ's were protected. What this says to me is the work comes when the practice is due and there is a relationship between the landowner/consultant/DNR to get good compliance on the ground at the time the practice is carried out, not when the plan is written.

For the most part landowners want healthy forests with wildlife, but the bottom line is they want a tax break, period. They are really not interested in what ecological management unit they are part of. I am not proposing going back to one page management schedules but we do have to find a happy medium between then and now that we can all agree on. WisFIRS will help.

T. Mulhern Forestry

PF-2

<p>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)</p>
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DNR STAFF COMMENTS

473. This makes good sense as it will save DNR foresters time and the plans will be reviewed for quality assurance. As long as it is a financially sound decision. Lets not spend money to just to give consultants work. Do what's in the best interest for the division.

Division of Forestry staff

474. One issue that I think it is important for DNR Forestry with respect to Private Forestry, is that DNR foresters are losing a skill set, or can't develop a skill set, for some of the work that foresters across the nation traditionally do. And that is how to set up timber sales, how to efficiently implement forest practices, how to "talk the talk" (when DNR forester can't do the "walk"). DNR foresters could lose credibility. There's a cost associated with decisions - and some of those costs are difficult to quantify (skill set for example).

Division of Forestry staff

475. I completely disagree with having cooperating foresters complete industrial transfer plans. I think the DNR has built the capacity of private sector partners plenty. Industrial transfers are our only opportunity to "write" a complete MFL. I believe this is a critical part of our job. We need to be familiar with completing MFLs so that we can be proficient in using the forms/template and eventually WisFIRS. Many DNR foresters currently review the plans of CPW's and many more answer questions from CPW's about the template/forms, etc. I know that there are many more transfers in certain parts of the state and if the local DNR forester cannot complete the plans, due to workload, etc., foresters from other areas should be given this excellent training opportunity.

I don't believe that this would "increase our investment" in this area but would keep our costs about the same since we currently write industrial transfer plans. If it would increase our investment I believe we could reduce, slightly, the planned effort to reach the "un-reached". At least in this county, we have had very little success with landowner meetings/programs we have put on to try and get to those un-reached. The last program we put on, which had a huge mailing to landowners in two counties (which NRCS paid for thankfully) had a total of 15 people show up. And only a portion of those people were interested in the forestry part of the program (the NRCS also covered some ag related issues).

Division of Forestry staff

476. So take a state run and funded program and turn it entirely over to the private sector, not a very wise idea. In my area it has not been the best run show with the cooperating foresters. Also there are practices that are not being done by the cooperating forester due to low profitability. With the plans that are being turned in there is more time spent in administering the coop forester than if we did them our selves. Plus the way some of these new coop foresters are being rubber stamped through the system is very discouraging to the field. Why not trust the people that are doing the reviews of the coop foresters?

Division of Forestry staff

477. I am adamantly opposed to paying for more and more consultants to do the work our forestry staff can do (even for industrial transfers). Tell the regions to suck it up and the work will get done (all their other work was given away). Almost all the private foresters I have talked to don't see what the issue is and that we don't need to pay consultants to do the work. It strikes me that FLT is all too eager to privatize the private forestry program. You will lose expertise, and employees if you take the field away from our foresters. To reassign them to reach "the great unwashed" (a term I find offensive) will only serve to add to their irrelevance and eventual demise at the expense of the 3+million acres of folks who wanted our help in the first place).

Division of Forestry staff

478. We'll put ourselves out of a job like they've done in many other states.

Division of Forestry staff

479. There is lack of support here in that this appears to be a minor workload item. There is the appearance of the Division "chipping away" at private forestry. This also seems to be an item where there is a measurable finite amount of work on the landscape and does not appear to be an item that would be useful to market to build private sector capacity. Discussion ensued here in that it was felt that industrial transfers were useful to the Division of Forestry in that it allowed DOF foresters to apply their skills and maintain familiarity with the "on the ground" portion of MFL administration and allowed them to maintain a common language with forestry cooperators. It is also felt that DOF foresters would also lose some tools available to them to do forestry such as justification for trucks, which are too few currently. There is a deep concern of the eroding of forestry skills and forestry credibility by staff in being able to communicate with cooperators as the administrators of the MFL program because of loss of field time with the private landowner.

Division of Forestry staff

480. Building capacity of cooperating foresters is good. What is more important is holding cooperators to standards better than we currently do. The current dispute resolution and CO system is extremely time consuming to proceed through. It takes too much time to work through issues with non-cooperative cooperators. We need not only more capacity, but also better quality. That would be a great time savings with MFL administration.

Division of Forestry staff

481. It is unclear what you want cooperators to do with the industrial transfers. Write their plans? Then say so.

Division of Forestry staff

482. Agree. However, the increased use of cooperating foresters should come at the expense of the landowner, not an additional expense we should take on.

Division of Forestry staff

483. I disagree with this one entirely. Having DNR Field Foresters write these plans are a means for the new owners and the local Foresters to interact and establish a working relationship. Having those first contacts are key in my opinion to a good working relationship.

Division of Forestry staff

484. I don't agree with a portion of PF-2. I agree with the statement of building the capacity of the pvt. sector but think DNR should continue to process and write plans for industrial transfers. Without industrial transfers I would not have had any opportunities to actually use the new MFL plan template. Maintaining DNR involvement in writing these plans will help maintain knowledge and skills that reviewers of plans should have. If you've never written a plan yourself, how can you judge the work of someone else - that includes being able to evaluate a woodlot on the ground and then translating that to a management plan that makes sense for the landowner. There may be areas of the state where this is a larger workload and then, it would make sense to shift a portion of this workload to consultants in these areas.

Division of Forestry staff

485. On page 16 - in the proposed change the term 'industrial transfers' should be defined.

Division of Forestry staff

486. This should only be done if it is less costly to use consultants over DNR foresters.

Division of Forestry staff

487. We have a 75 % increase in cooperating foresters because "WE ARE HANDING THEM THE CAKE AND LETTING THEM EAT IT TOO! Those cooperators are writing MFL plans where they can make money in a hurry. That's fine; at least we are getting landowners committed to forestry. 10 years ago cooperators griped because DNR foresters were setting up all of the timber sales. Over the past 4 years, very few cooperators come into my office to see the mandatory practice list. Loggers are the dominant customer for that list today. Why is that, because the cooperator can make easier money elsewhere?

We don't need to hand the transfer plans over to the private sector. That new landowner deserves service from a DNR forester. Giving these plans to a cooperator would require a lot of work from the DNR forester, work that can easily be put into preparing a new plan. It just is not efficient to have the private sector prepare transfer plans and it is not fair to that new forest landowner.

The cooperating forester's niche is to work with the NIPLO. BUT, they have to do some legwork on their own. It is not our job to prepare and hand work to them. In the last 2 years, I have not seen one letter from a cooperator to a landowner who had a mandatory practice on their lands.

Maybe we should give an incentive of sorts to those cooperators who prepare a non-tax law stewardship plan or establish a sale for a landowner?

Note: While increasing the use of cooperating foresters is laudable, the crux is in the details. Past discussions with WDNR Field Foresters leads me to believe that if we are to use Cooperating Foresters more, then we will by necessity need to strengthen standards enforcement within the Cooperating forester program. In the predominant private consultant's business model, low value harvests are avoided as a private consultant's compensation as a function of the value of the

sale is low. Likewise their ability to follow order of removal is potentially compromised by the short term focus on sale revenue vs. stand vigor, health, etc.

In addition, when problems are noted with cooperators, it is often hard to have the problem addressed in a timely fashion. Giving the program teeth and creating consequences for not adhering to the cooperating forester agreement will be crucial to making this work. I am not opposed to using cooperating foresters. On the contrary, I support increased use of them but only with increased policing and accountability on their part.

Division of Forestry staff

488. Absolutely disagree with CPWs writing industrial transfer plans. DNR doesn't write plans anymore. Eventually, how can we critique plans if we do not have any expertise in writing them (unless they are so generic it doesn't matter anymore - which is becoming the case)? Lots of these plans we currently write are for cut over aspen stands. Why price gouge the private landowner for something so simple and quick for DNR to recon and write up?

Division of Forestry staff

489. What does the term "such as industrial transfers" mean?

Division of Forestry staff

490. 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. Comments: Building the capacity of private sector partners is only part of it. Building capacity should be done in conjunction with building their reliability and quality of services.

Division of Forestry staff

491. Good direction. Cooperating foresters should be able to provide service on this big work load. Industrial transfer plans should be treated like initial MFL plans.

Division of Forestry staff

492. I fully support the use of forestry partners especially the cooperating forester program. The workload to sustainably manage Wisconsin's forest has surpassed the capabilities of WIDNR foresters and the cooperating forester program is an absolute necessity. The WI DNR does a tremendous job promoting our partners (Cooperating Foresters, Master Loggers) but I feel the favor is not reciprocated. When you go to the websites of our partners is there a link to the WI DNR Forestry page?

I feel the cooperating forester program must hold the cooperators accountable for their actions. How can we continually promote and refer cooperators whom undermine our handbooks and mission? A level of performance and a quality of service must be maintained. Private cooperating foresters are such a valuable resource however there is only one position, Private Forestry Specialist, to administer the program. It seems that additional staff could be allocated to help better administer the cooperating forester position to meet training needs and monitor performance.

Division of Forestry staff

493. Let's not just make full use of consultants, let's set a standard and do what we can to improve the quality of their work. That reduces time spent on MFL administration.

Division of Forestry staff

494. This seems like a difficult procedure that would require a lot of administration by the state forester. The cost/benefit ratio of this procedure does not seem proportionate. A state forester would have to be administering the cooperating foresters. A cooperating forester costs more per hour than a state forester. It would cost the state twice as much to accomplish the same amount of work and there is no guarantee on the quality of work that would be conducted.

Division of Forestry staff

495. Disagree. I think the Division needs to increase efforts to make full use of DNR foresters. The DNR foresters are becoming "forest police" in private forestry instead of experienced field foresters.

Division of Forestry staff

496. —again do not let the bar down in an effort to increase capacity---more training is required.

Division of Forestry staff

497. To continue with that same theme, I feel strongly that having at least some ability to write MFL plans is essential to maintain the DNR foresters' ability to review CPW plans. The only true opportunity for us to do that anymore is in industrial transfers. We should not be giving these to the CPWs too. We need something to keep us in the loop, because there are foresters in this department that haven't and won't have to actually write a plan if they don't have industrial transfers in their area. What is the sense having a guy review a plan that he has never had to opportunity to write one. DNR foresters need to have the chance to write plans too and if some areas are inundated with a boat load and others don't have many, there has to be a push from the supervisors to have surrounding foresters help out in writing plans and even further integrate Rangers into doing some forestry to help out. I stand behind this and I have offered and will offer in the future my help to surrounding areas that have a glut of plans that need to be written so DNR foresters still have some to do and not have everything given away to cooperators.

Division of Forestry staff

498. This is the last real opportunity for DNR forester to write some management plans using the private forest management forms. If we are forced to only administer activities that we ourselves are not practicing we are going to be losing credibility with the landowners and with private sector foresters. We don't have foresters knocking down our door looking for work and we are able to manage this workload. Believe it or not, much of the field has had an uphill battle working with "cooperating foresters", since plan writing was handed off to the private sector we have seen a degraded management plan, a tax law program that is harder to explain and changes faster than handbooks, forms and informational publications can keep up with. The current system of industrial transfers is NOT broken... don't try to fix it. It arguably takes as much or more time to review a private foresters management plan as it does for DNR forestry staff to write the same plan, plus it is still an opportunity to relate to a property that we are asked to administer. It seems that too often we have internal decisions that are coming from Madison without field input of how it will affect operations.

Division of Forestry staff

499. PF-2: Using cooperating forests to write industrial transfer plans is agreeable, but what other activities are being considered? What is the rest of this proposal? There is a "hidden" agenda here!

Division of Forestry staff

PUBLIC COMMENTS

500. Agree.

M. Luedeke

501. Agree. Need to work hard to get these people helping.

N. Paulson

502. PF-2; S-2 The private sector has shown through the tremendous success of the CPW program that it will respond to workload demands through growth. With the availability of DNR staff decreasing, the private sector should be considered as a tool to help make the private forestry program be all it can be.

K. Quast, Quast Forestry

503. I found the discussions, in the Strategic Direction document, of private cooperating forester involvement with forest management on private and state owned lands to be very interesting.

There certainly are economic realities that the Division must deal with, and contracting with private forest management providers to do some work formerly done by DNR foresters might be a way to decrease the cost of getting that work done. I noticed in the document that the effectiveness of contracting this work is under study, and I am glad to see that decisions by the Division on how to proceed with contracting are being approached thoughtfully.

As further study into this issue continues, I hope that the Division will keep in mind the importance

of providing new DNR Foresters with the experiences that can be gained only by involving them in the actual preparation and administration of timber management activities like site preparation, timber harvests, tree planting, timber sale contract administration, etc ..

If DNR Foresters are to be fair and effective in representing the state's interests in dealings with the forest products industries, they must have the types of experiences that can be gained only through the field experiences of preparing and administering the types of work that they are supervising. Or, in short, make sure that there are still enough of all aspects of forestry field work available to your field foresters that will teach them how to be foresters.

T. Salzmann, Sandhill Land Services, LLC

504. In the Privately Owned Forest Lands section of the document we are concerned with an identified approach under PF-2. "One approach will be to increase the use of targeted landscape scale management programs to efficiently reach and assist willing private forest landowners who have land within a specific geographic area." This statement presents several obstacles and opportunities for inequality among forestland owners based on personal perception. Who will make the decision on what geographic areas will be identified as "priorities"? If priority landscapes will be those identified in an existing document, i.e. "Wisconsin Land Legacy Report", we suggest that document be referenced.

J. Severt, Wisconsin County Forests Association

PF-3

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)

DNR STAFF COMMENTS

505. There are very few foresters in the state that would disagree this is important. We have worked hard to do this with limited funds available to help us. In recent years this has not been a high priority place to spend \$ as budgets have been so tight. So this direction is great as long the financial resources are available.

Division of Forestry staff

506. If we aren't reaching out to unengaged forestry landowners, we aren't truly achieving our Mission. DNR private lands foresters could do this work or UW Extension foresters/basin educators could do this work with the caveat being the institute to do this work would need to hire additional staff or alter the direction of their work (particularly true for UW Extension).

Division of Forestry staff

507. So instead of spending the states time and money on practicing forestry on state lands and MFL work we should instead go out to recruit new clients for cooperating foresters. I do not see the fiscal responsibility in this. If state foresters are not allowed to work on really anything in the MFL program except to push a few papers and turn in to a regulatory role why should we be recruiting new clients for them. If they need the business then why don't they spend the money and time to make the money? I just don't see why we should be giving away our work, which in most cases requires us to have more paper to push, to allow the private sector to make money easier. The people I know did not become foresters to be sitting in an office pushing paper or to become some private consultants unpaid client recruiter.

I think that there are ways to improve upon the way the state runs things. There is always room for improvement, but when you start to sacrifice quality of service for the sake of progress you really are not gaining anything. As a state forester there is a sense of ownership in the properties you manage that helps to elevate the quality of workmanship put into managing the forest. I feel that you will not get that with most private foresters working on state lands. The mentality of "it is the state they won't miss it" or "they can afford it" will be there and the quality will suffer, and with forestry it will be evident for a very long time.

Division of Forestry staff

508. Speaking of diminishing returns, to expend greater and greater resources on landowners with smaller and smaller acres will provide poor results and poor payback to the citizenry of Wisconsin. I have no problem doing outreach to reach more landowners but think we need to be honest with ourselves and our partners and make some conscious decisions about lands that are simple too small to provide much benefit for the investment. I think 10 acres is absolute minimum parcel size and maybe it should even be bigger (ever try to sell a 5-10 acre timber sale that is mostly pulp), and then develop a program that really works to reach those people. Take the money we would spend reaching small or isolated parcels in an agricultural or urban landscape where management would not likely occur and reallocate it to maintain our role in private forestry as an implementer instead of a regulator and extension agent. Rather than significantly increasing investment in IT, I would suggest maintain current investment trajectories to complete planned IT projects and levels and use the available resources to maintain our role in private forestry.

Division of Forestry staff

509. I challenge the statement that "the key to sustainability is a management plan." Our silviculture handbook and other guidance is what makes it sustainable and the logger/forester/consultant that sets up the timber sale make it sustainable if they are doing good management. All a management plan adds is some consistency and direction to the management of the property. But, and here's the big one, almost every landowner that buys a property has different objectives from the last owner. What we see change most often with a new owner is a change in objectives which often redirects the management from say oak to central hardwoods because of what the management technique looks like. Oak management is pretty ugly to most landowners and central hardwoods management isn't.

Therefore, if you reject that requirement for a management plan to be sustainable, we then focus our effort on training loggers/consultants/foresters to make their work more sustainable.

...

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Therefore, if you reject that requirement for a management plan to be sustainable, we then focus our effort on training loggers/consultants/foresters to make their work more sustainable.

Division of Forestry staff

510. There is disagreement to invest in this in that past efforts have not changed the numbers in this population of forest landowners with no professional support. This is also an identifiable role for externals such as UWEX, and a review of the cooperating forester program to market it in a form such that a cooperator is only advertised in the area that they "actually" work in and not statewide, as they list. This review will also allow the DOF to identify areas of the state that may be deficient of cooperators and find ways to market these areas to increase private sector capacity. This would be a benefit to private landowners in under represented areas and a benefit to the state in the creation and or expansion of firms and jobs.

Division of Forestry staff

511. I agree that this is an opportunity area. I am cautious of putting too many eggs in this basket however. Perhaps many of our "great uninitiated landowners" have remained "uninitiated" for a host of their own reasons -- and not just because we haven't reached them with our message.

Division of Forestry staff

512. Partially Agree. For years and years we have focused on the need for a management plan and we continue to say the key to sustainability is the presence of a plan. Yet how do we know that? Have we asked landowners? Do they cherish or even read their plans? Are the new template plans what they are really looking for? Or do they value a walk in the woods with a forester more? I would suggest focusing more on the need to get a forester on the ground with the

landowner and less on a formal written plan. The education and outreach should be targeted at helping to accomplish that.

Division of Forestry staff

513. I agree with this one entirely. I am a strong believer in doing outreach to landowners and enjoy doing it.

Division of Forestry staff

514. I have some heartburn over this proposed change. Reaching the un-involved landowners or un-interested landowners is an uphill battle. Unless some radically new idea comes along that will be the "magic bullet", I question the value of prioritizing our time in this area. I feel we should be focusing our efforts on landowners that have committed to forest mgt. through the MFL program in helping them to follow through with mandatory practices. I'm not advocating we walk away from non-tax law owners; we should serve them as requests come in. I am just skeptical on whether or not we can make any headway with this group. We have one of the very best landowner assistance programs in the country and, over the last 25 years, we still only work with 15%-20% of the pvt. landowners out there (same % as it was long ago).

Division of Forestry staff

515. I agree with this proposal. However, just advertizing or attending work shops will not reach the people being sought. The best way to reach these landowners is through word-of-mouth from neighbors, friends, and relatives. Foresters doing on the ground visits and setting up practices gets noticed. Providing science based information without the question of profit or short term gain generates landowner confidence.

Division of Forestry staff

516. ...in particular the reference to "increase the use of targeted landscape scale management programs to efficiently reach and assist willing private forest landowners who have land within a specific geographic area is music to my ears! I would love to see wildlife and forestry work more closely on some landscape scale projects that feature the importance of working with private landowners. The opportunities to work together to deliver private land forestry assistance to benefit a project like the Lower Wolf River Bottoms Natural Resource Area would be great!

DNR staff (non-Forestry)

517. I am very unclear on what this is and how it will be effective.

...

There is only a certain percentage of folks we can reach, and beyond that we are wasting time and money. Give me some specifics and I can comment more specifically. If we could not reach folks with less than \$2 per acre property taxes when entering into MFL in 2004 (when taxes were sky rocketing) then I don't see how we can reach many more. \$\$\$\$ is the only incentive that draws in the most folks. I sure don't think it would be appropriate for me to spend a lot of extra time and money on this effort when I could be reconing or establishing timber sales on state lands.

Division of Forestry staff

518. The 2006 survey information means little to me...I don't necessarily care if the landowner had a plan. What matters to me is whether the harvest was done using proper silviculture and is sustainable. Many of our cooperating consultant foresters establish timber harvests without a plan. Has any work been done to find out what percentage of our non-industrial private non-tax law lands has had a timber harvest that does not meet our silvicultural guidelines? Totally agree with clearly defining our role in reaching and informing private forest landowners.

Division of Forestry staff

519. We talked about forest landowners and the people that are un engaged. First we need to define what a un engaged landowner is and how do we track those. Are they that are not in Tax Law, not in tree farm, not part of WWOA, don't have a management plan, don't harvest their woods, or harvest their woods but not correctly. I think we have work on that 7million acres but we have no idea how to track it and therefore it will for ever be. You go out on a field visit on a property and put it in your accomplishment reports and you don't know if the person followed through on your recommendations or not. It is just like fire prevention and asking how many fires do you prevented? Looking at old files of people that are not in the tax law program we have looked at a lot of wood in the past and are still, and give our recommendations and info on the programs that may work for them and their land. But if they do make a point to get a cooperating forester or go with are recommendation we would never know. So this is my proposal that we start tracking

the NTL lands that we have visited and have made recommendations on but let us not make this complicated with more paper work or another accomplishment report. Use the new WISFIRS system to map out the lands that was visited, when and by who and the recommendations. This to me would be useful info to the industry and the landowner or new landowner to manage their land and hopefully on a sustainable level.

Division of Forestry staff

520. 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. Comments: The statement "landowners who receive no professional assistance" should not be narrowly defined to be only landowners who have never received services but must include those who cannot find the assistance in the private sector to take them to the next step in management.

Division of Forestry staff

521. Agree BUT Madison direction has been just the opposite. Fewer management plans with private landowners are allowed or time allotted to in work plan.

Division of Forestry staff

522. I think PF-3 is important but am concerned that DNR Forestry recent "retreat" from outreach activities may have left us in a position from which we need to catch up. The Division will need to be willing to invest the time of its staff to successfully accomplish this; and results won't appear quickly. I would like to see the capacity of "private sector partners" built (PF-2) but, again, I'm not sure how successful this will be. After years of working with some cooperating foresters trying to get them up-to-speed for writing MFL plans or marking sustainable harvests, they still aren't doing it well. I don't know if they can't do it or if they don't want to do it. My biggest fear is the latter because this means that as internal staff spend less time administering MFL practices, the level of sustainability will decrease. My supervisor tries to allay my fears by stating that certification standards still need to be met. But, if they are not meet most of the time, we will lose certification.

Division of Forestry staff

523. It is imperative we invest in private forest landowners. This is the role of the DNR. The Division must promote professional foresters rather than promote forestry. Foresters will sell forestry. What I mean is WIDNR spends too much time and resources promoting forestry through partners such as the Master Logger program and landowner groups. Why promote loggers when landowners should be working with a forester. Loggers still see foresters as hurdles rather than allies. WWOA is another good example. Don't get me wrong... WWOA is a fantastic landowner program but sometimes those landowners don't see the value of a professional forester when they can talk to their neighbor that had a timber sale. We promote the importance of a forest management plan. Even if a landowner has a management plan can we be positive that it will be implemented correctly?

The WIDNR must promote the value of a professional forester. Once the public perceives there is a value to a forester all the doors have been opened and they will trust their forester and their judgment. This is a daunting task given our partners do not defend or support the value of a forester. Why then do we support them?

Division of Forestry staff

524. I agree and am glad to see this shift included. It seems the DNR can use partners to help accomplish this goal.

Division of Forestry staff

525. I agree that our role should include this direction. Concerns I have include:

Out of the large percentage of folks that didn't have a management plan before they harvested, how many actually want one? We seem to assume that everyone wants some type of assistance.

I'm not a big fan of professional foresters being replaced by Woodland Advocates. We should make an effort to utilize the foresters we have on staff to do forest management work and not just forest protection work. Forest protection (fire control) is not a 12-month/year responsibility. This direction has to come from the top down. We also have some qualified technicians that could assist with outreach.

Division of Forestry staff

526. 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 MFL.

Division of Forestry staff

527. The DNR foresters should be able to do all the work (establishment, administration, etc.) on these sales. It will give the DNR foresters experience that is needed.

Division of Forestry staff

528. Great...maybe each willing DNR private lands forester need s a professional facebook page that could be used update at least weekly. We could perhaps ---eventually get the word out on conferences-workshops trainings—post information on local invasives working groups. Feature an invasive of the week/month. Tree of the month/week....or just share something cool we know other landowners are doing... notes on what we are seeing in the woods IF WE GET TO THE WOODS!!! We need to foster more of a climate of sharing...

Division of Forestry staff

529. I strongly agree in the push to reach out to private landowners that are not receiving professional forestry assistance. Things that I have seen work are the Learn About Your Land series and reaching out to landowners that file County Notices not in the tax law. I'm sure there are other ways to do this and those ideas probably have been and should be brainstormed and attempted.

Division of Forestry staff

530. We need to make ourselves available to assist landowners and sell the idea of good forestry. Again the proposed change is very vague and does not begin to explain at what expense and with what methods are we going to attempt to reach the unreached. On the surface, it seems sense to try to assist the un-assisted, but the simple concept is good but we don't have any real strategies identified. I think some worth while endeavors would be to develop and promote a program that would help communities of small landowners to develop small term (single timber sale) CO-OPs of sorts to help the recipients of parcel-ized/ fragmented lands to organize for the purposes of timber management activities. (Example: A community of landowners dealing with oak wilt, landowners each own .5 – 3 acres of land, but an organized cooperative timber sale in the community could help minimize risk and help the overall forest health. One or two landowners may have to pay a tree service, 20 landowners with ½ a dozen trees each may be-able to break even or receive some income for these same trees.) DNR may be able to initiate the process to get uninformed landowners to collaborate, introduce and promote landowners to go to organizations such as WWOA, WI Family Forests or Land trusts who can get landowners educated. DNR could be the catalysts, but organizations such as WWOA, WI Family Forests, etc, already exist to assist, DNR can help fill the gaps where forest landowner advocacy groups are not well developed.

Promote development of simple forest management plans for landowners and cost-share non-tax law management plans. Discontinue or reduce the WFLGP 50% cost share for tax law management plans. Use the WFLGP money more for the landowners who are not out for the tax break and for on the ground work (tree planting, invasive control, non-merchantable thinnings, prescribed burning, etc.).

Division of Forestry staff

531. There is an intention to reach, inform, and assist private landowners (p. 16, item PF-3). Has there already been an effort to listen to private landowners to understand why they do not have a management plan?

Division of Forestry staff

532. PF-3: Agree, but how! The Learn about Your Land workshop series works up to a point. It is not the entire solution to reaching private forest landowners who are not using professional assistance. The Learn about Your Land workshop series was used within my county in 2010. We had a favorable response. Overall there were 40 to 50 participants within each of the 6 workshop sessions we put on in our county. Approximately 20 of the participants requested a property walk-through. But only 50% of these landowners actually followed through with the request for the property walkthrough when we contacted them.

Division of Forestry staff

PUBLIC COMMENTS

533. If landowners do not want professional assistance they should be left to their own devices. Many such owners obviously feel they have adequate knowledge and can make their own decisions on their own land.

A. Ode, Bayfield, WI

534. Strongly disagree. Don't support increased investment in reaching landowners who have not taken advantage of existing professional forestry services. These landowners have shown low interest, little initiative to seek help, hold increasingly smaller parcels which limits effective forest management, and produce low return on education investment since small landowners don't have forest management as a priority. Landowner workshops have repeatedly shown small forest landowners have very low interest in forest management, hold land for other principal uses, and rapid turnover of ownership undermines the investment in accumulating forestry education for a given parcel.

This draft proposal appears to shift assistance away from landowners who have already recognized the value of professional advice and benefit from ongoing support. Continuing to help these landowners would keep these lands productive and slow their fragmentation into smaller parcels with reduced chance of sustainable forest management. DNR should instead maintain investment in assistance that produces results and maintains working forests. This assistance should become an incentive for other smaller landowners then to seek out help once they have made the decision to seek professional help. This assistance should be provided both through the private sector forest community as well as through reasonable DNR field staff assistance. DNR should maintain assistance to where the program is the strongest rather than invest in the weakest sector where results are low. Give consideration to limiting DNR assistance by size of property since there exists a threshold of size at which sustainable forestry on such parcels will not likely be practical. Don't invest time where productive results cannot be anticipated.

M. Luedeke

535. One portion in particular I wish to comment on and that is on page 16: Support the increased investments in effort to reach a large percentage of private landowners who receive no professional forestry assistance. This has always been a problem and continues to be one. We in Wisconsin have applied sustainable forestry to all our public forest lands and those private lands under the Managed Forest Law. It is time the DNR Forestry works toward putting this same emphasis on those private lands without management assistance. I rate this as an extremely important part of the Strategic Plan.

W. Kiefer, Nebagamon, WI

536. Agree. Fits right into PF-1 & 2. That is who has the large majority of the Forests.

N. Paulson

537. We concur in PF-3 and offer our assistance to accomplish that objective change.

L Hanson, WWOA,

538. I fully concur. Non-sustainable timber cutting is rampant. This is likely beyond the capability of DNR Forestry to control and action by the state legislature is really necessary.

D. Pubanz, Wolf River Forestry

539. PF – 3/5 Focusing cost sharing money on areas of greatest need is a topic that has been pushed by the private sector for years. With available funding decreasing, re-evaluating the use of these dollars and determining where they should be appropriately allocated is essential to fulfilling many of the overlapping strategies.

K. Quast, Quast Forestry

540. We strongly support this proposed change. Targeting outreach to those landowners who currently receive no professional help is essential to safeguarding the overall well-being of Wisconsin's forests. Simply put, we collectively must find ways to reach and engage many more small forest owners than we do today. However, given the sheer numbers of private forest owners in the state, no entity, including the Division of Forestry, could possibly hope to accomplish this massive undertaking on its own. It must be done in partnership. And it must be done to take full advantage of the specific expertise brought by the DNR's foresters and other professionals.

To this end, the new Driftless Coalition is establishing a comprehensive database capable of tracking outreach so that we always know what has happened (or not) with a landowner and what needs to happen next and when. We are also developing a robust peer-to-peer network to help fill the critical gap between initial outreach and the decision by a landowner to engage professionals, such as Division foresters. We believe this will help us maximize the impact of each partner group, and in the case of the Division foresters, maximize their ability to spend time directly with landowners at just the right time in the landowner decision making process. We believe this partnership with the Division is a good example of one way to gain greater efficiencies in reaching and supporting landowners.

We further support the suggestion to use targeted landscapes to identify landowners for outreach. This is precisely the approach the Driftless Coalition is taking as we focus, integrate, and leverage our collective resources toward more impact. The coalition used the Statewide Assessment in selecting our focal landscape; having the Division extend this approach toward additional focus for outreach would continue to move our collective efforts in the right direction.

J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

541. I believe this is the Division's work. There is a role for the consultant forester but it is not as the instigator or the party responsible for bringing landowners together; either on a landscape scale or a subdivision scale. The Division has the resources to reach out and make contacts, in my opinion it is more difficult for a consultant to do that.

T. Mulhern Forestry

PF-4

<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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DNR STAFF COMMENTS

542. Owning land gets you further in the long run, has a better public benefit, ensures proper management, and will in time produce revenue. Negative is the payments to the local municipalities in lieu of taxes. I don't know enough about this direction to comment any further. Again, this sounds good if the budget would stay as is but in reality as the budgets tighten I would not like to see this area as a high priority.

Division of Forestry staff

543. Supportive as long as funding or investment is increasing sustainable forestry and land is managed for forestry first and other benefits secondly.

Division of Forestry staff

544. Agree. Obtaining land management rights for large industrial ownerships through easements may be a more effective use of our money as opposed to outright purchase as long as we can ensure these properties are appropriately managed using the same management philosophy and silvicultural standards that we employ. My main concern is that DNR and industry does not always agree on the appropriate management and that investment companies will not always turn to DNR for management advice. There needs to be strong language in the easements to avoid such conflict and to maintain DNR oversight.

Division of Forestry staff

545. I agree this one also as long as these properties are still managed for sustainable forestry.

Division of Forestry staff

546. Conservation easements often cost almost as much as purchasing the land. Would it not be more economical to make the MFL program easier and less costly to enter?

Division of Forestry staff

547. The Division is proposing an increased investment in programs that utilize conservation easements to increase and secure private forested lands. Comments: Conservation easements are a good tool and can have an immediate and permanent affect on decreasing parcelization but we need to aware of the time it can take to monitor and manage easements held by the Division. We don't have to the hold the easements there are an increasing number of land trusts and counties that could hold the easement have responsibility for monitoring and management. Our role may be to support others in obtaining easements – providing the technical advice.

Division of Forestry staff

548. Utilizing other programs rather than Forest Tax Laws is a valid investment. Not all lands should be in tax law.

Division of Forestry staff

549. Agree that conservation easements are a good tool to protect private forests from parcelization, conversion and development. The Division may be better able to accomplish this than land trusts and even the DNR's land acquisition program due to the knowledge of forestry and forest management which would be included in the terms of the easement. Easement can also be a good tool to ensure proper management is being done to achieve larger goals-such as habitat for an endangered species. However, it is important to consider the long-term management and land stewardship when determining how this will be implemented. If the eased lands are not monitored a McDonalds may end up in the middle of what is supposed to be a protected forest.

Division of Forestry staff

550. Agree.

Division of Forestry staff

551. Also good. In addition to along these lines of easements why don't we (DNR) target area like along river ways (in ag country) to bulk up tree planting and creating better habitat for fish, birds, herps

Division of Forestry staff

552. We are fooling ourselves if we think our existing cost sharing programs are going to do anything to curb land parcelization or allow landowners to hold on to their land (as mentioned in the narrative). That is an argument in favor of the tax law program not a justification for prioritizing cost sharing. I understand the concept of the reprioritization, but question if it is truly an issue. Are cost share applicants really being denied because programs are oversubscribed by applicants already in MFL? As far as I know, we have no way to prove that is actually occurring within our WFLGP system. The closest tracking for that are WFLGP applicants for cost sharing MFL plans, but they are not in MFL yet. (Perhaps someone took the time to cross check past WFLGP applications with the MFL database. I doubt it, but if so, I stand corrected).

As far as the federal programs mentioned in the narrative (EQIP, Hardwood Forestry Fund), I question whether MFL participants are displacing non tax law applicants and furthermore, do we have any authority over those programs to even do the reprioritization. I think this proposed change is pretty gray as far as justification goes.

Division of Forestry staff

553. Conservation easements is another great idea that I agree with the division taking investment in. With parcelization and development being big threats in the state, these easements are a great idea to help slow this stuff from happening. I have seen it work while living and working in the east and it will certainly work here and from what I've seen and heard this method is pretty small in WI, as I haven't worked with them yet much at all.

Division of Forestry staff

554. PF-4: I need more information here. Is this being done elsewhere? What type of conservation easement? There are other agencies and organizations performing conservation easements, what would the DOF look like. PF-5: Another proposal where I need more information. What is this proposal getting at? Is this the same as PF-3? The tax law program is already in place, what would this proposal program look like? Seems like it could be redundant or duplication!

Division of Forestry staff

PUBLIC COMMENTS

555. This is an area probably best left to the state's land trusts.

A. Ode, Bayfield, WI

556. Strongly agree to give higher emphasis to use of Conservation Agreements versus fee title acquisition. This is an effective use of limited public funds, keeps land in private ownership, but secures long term natural resource values for public benefit.

M. Luedeke

557. Agree as it is stated. It is important that the lands be multiple use.

N. Paulson

558. We do not however agree with PF-4 which includes increased investments in conservation easements. We believe that should be the domain of land trusts where ever possible. Increased involvement assumes either state or federal assistance and we believe state dollars could be better spent by encouraging landowners to enter MFL or manage their land under a stewardship plan.

L. Hanson, WWOA,

559. I fully support this intention.

D. Pubanz, Wolf River Forestry

560. I was pleased to see recommendations for: Increasing in investments in using conservation easements

J. Solin, UWSP

561. While conservation easements might not be the right option for many private landowners, they are a powerful and proven tool for protecting forests. We support the proposal to increase investment in this tool. In doing so, though, it is important that additional investments result in easements that accomplish all of their intended goals: help landowners meet their land management objectives while keeping their forests as forests and protecting the public benefits and values provided by those forests. The Division can play an important role in ensuring that easements address all aspects in a meaningful way.

J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

PF-5

<p>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)</p>

DNR STAFF COMMENTS

562. The WFLGP program is great and this direction was developed assuming current budgets. However, there is something to be said for a landowner wanting to improve his/her property without financial assistance.

A proposed change right off the bat should be quit funding MFL plan development. This makes no sense. 99% of landowners who join MFL would do so with or without financial assistance as joining MFL pays for itself in one tax year. This large investment by the state has virtually zero benefit on sustainable forestry. This is a wide felt opinion of many foresters. Simply makes no sense. I've heard the argument that it reaches more landowners than the more expensive projects such as tree planting. I believe that's true but the result of this use of fund just saves landowners money and does nothing to improve the environment. Also, it is a bad use of my time. Again, this paragraph may not be addressing the direction very well but it is an important change to be made while visiting the direction of the WFLGP program.

The WFLGP program is a great program for convincing landowners to do forestry projects such as tree planting or crop tree release as it requires them to have a DNR approved plan for their property and a plan for the practice which often results in a successful tree planting that would have failed without DNR involvement.

DNR foresters already push use of this program for non-MFL landowners. I don't know what is expected to increase this effort by foresters. We know how important it is to reach non-MFL landowners. I disagree with the idea of favoring non-MFL landowners vs. MFL landowners. The goal is sustainable forestry. If a MFL landowner has a worthwhile project I do not see why a non-MFL landowner should come first. Let's spend WFLGP dollars where we see the greatest benefit to sustainable forestry. Again, foresters already do this. I do not want to see MFL landowners at a disadvantage for the money.

This is not in the quotation above but it is included in the strategic direction "utilize federal funds such as EQIP" We already do this. We don't need it to be a "strategic direction" but if you want to include it that's fine. Programs such as EQIP do have disadvantages which limit its usefulness. #1 it is quite a process that a fair amount of landowners are not willing to go through which is their decision and their loss. #2. The grants are typically due early January and you would find out if you are funded in February some time. If a landowner wants to plant trees he doesn't know if he is funded until February which if he needed to spray he has already done this or his grant may not get funded and then he must wait another year. This program is good if the landowner knows he wants to plant 1.5 years in advance but how often is that the case. Same with MFL plans. You would not know you were funded for plan writing until after the plan was written in most cases, and then if you do not get funded you have to pay the whole price or wait a year (which no one does). EQIP has its uses, we've used it for tree planting, crop tree release, pruning with good success but there are limitations and that needs to be realized. The WFLGP program was well designed and very suitable to landowners and timelines so it will still be recommended over EQIP in many circumstances, and for good reason.

Division of Forestry staff

563. I like the concept of this plan but am very concerned that it is limiting funding to the most active private forest managers. It makes it seem like it is discrimination against landowners whom already have a management plan. Providing funding to a landowner to actually improve their forest should rank very high! Getting a management plan written for a property does not ensure that good forest management is going to occur. It is only the first step.

Division of Forestry staff

564. 1. Eliminate cost sharing for plans! They get this money back in the first few months of being in MFL. This is an unneeded use of precious funds. They do not need this incentive. Saving 75% of their taxes is enough. I have never had anyone cite this as the reason they were going into or staying out the program.....
2. Penalizing MFL landowners in the Grant system by ranking them lower or however it would be proposed is not a good idea. They, if anything should have a higher priority because they have made the commitment to managing their property.

Division of Forestry staff

565. Excellent, MFL landowners already get enough money.

Division of Forestry staff

566. Agree, but I am confused in how the last change concerning incentives will be implemented. In addition when implementing incentives with across all the programs county, industrial and private, consider adjusting future cost sharing toward species or types of greatest concerns that we have identified. Example may be in the Bayfield Sands Landscape focus may be more toward cost sharing to promote jack pine verses red pine across the landscape.

Division of Forestry staff

567. Overall support that funds are used for those that are not receiving other financial incentive programs avoiding duplication and double benefits.

Division of Forestry staff

568. I agree -- this is a very good way to incentivize forestry to more people rather than increasing the incentives to the same size group.

Division of Forestry staff

569. I do not support excluding MFL land from all cost sharing, if that is what this is proposing. Some things are very expensive like invasive species control or site preparation, that an MFL owner may need to do. I would support not cost sharing MFL plans.

Division of Forestry staff

570. Agree. No additional comment.

Division of Forestry staff

571. I agree providing financial incentive to landowners is a good idea for most forestry projects particularly tree planting and invasive treatments, but not for MFL plans.

Division of Forestry staff

572. Incentives for performing management practices should be available to all landowners if the money is available. If needed use a priority system to allot the funding.

Division of Forestry staff

573. Stop cost sharing MFL plans. This is beginning to be a huge selling point for cooperators to write plans, when the landowner is already sold on entering into the program. These landowners are going to receive a big incentive once they are in the program; we don't need to give them more. Use the money to encourage those who don't have a plan to get a stewardship plan developed.

Division of Forestry staff

574. More government give away? At what point does all the spending stop? If this must be done, stop using WFLGP funding to supplement cost for CPW tax plans and use those \$\$ to encourage new landowners to manage their land. Tax law landowners will opt into MFL anyway to save tax dollars - even if the plan isn't cost shared. These \$\$ accomplish nothing on the land other than to justify CPW plan price gouging.

Division of Forestry staff

575. I've read this several times, and am still confused as to whether the use of WFLGP money is included in this statement. Currently, the majority of WFLGP dollars go to cost sharing MFL plans. Is the desire in the Strategic Direction to continue that? Or to direct that money towards landowners who currently are not in MFL?

Division of Forestry staff

576. 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. Comments: Perhaps I do not fully understand this proposal but I believe we should not turn our back on people who are in the MFL or who have used professional assistance in the past. There are many non-mandatory practice recommended in MFL that do not get completed. Cost sharing programs provide the assistance to get the other work done.

...

There seems to be a myth that all woodland owners are wealthy and can afford to pay for all services. This may be the case for some but most woodland owners in Wisconsin have household incomes at or near the average for Wisconsin (\$55,000). Many woodland owner are retired (or approaching retirement) with a fixed income. They struggle to maintain and manage their woodland ownership. Turning our back on these landowners will increase the likely hood that they will divide and sell their land.

Cost sharing is a way to get landowners to invest some of their own dollars and time in their woodlands.

Keep in mind that the clientele that we see at our door step does not necessarily represent all the woodland owners who have not come to our door.

...

General Private Forestry Comment: It was very good to see that the strategic direction includes/reflects the goals that were approved by FLT for the private forestry program in August 2009. The four goals for the private forestry program are: Increase education and outreach to woodland owners, the public and policy makers that helps them identify and understand the value and benefits of maintaining and sustainably managing Wisconsin's private forests. (CP-4)

...

Maintain the amount of privately owned forests in Wisconsin and minimize parcelization. (PF-4)

...

Maximize privately owned forests managed based on generally accepted forest management practices. (PF-1, PF-2, PF-3, PF-5, CP-7) Support and engage private forestry partners whose actions extend and strengthen capacity in reaching the private forestry mission. (PF-1, PF-2, CP-1, CP-2, UM-1)

Division of Forestry staff

577. This proposed change seems unclear what is really intended. In terms of WFLGP all landowners need a Stewardship Plan and therefore receive professional assistance. What is meant by professional assistance- just MFL or a landowner that has received advice from a DNR Forester/Cooperating Forester, what about NRCS with EQIP or CRP Programs? Is professional assistance indicating financial assistance? WFLGP is enjoyed for its simplicity and easy administration. During the recent program review it was echoed over and over again that this program should not become complicated and an administrative burden. Field foresters will be responsible for track whether or not a landowner has received professional assistance. Even with WFLGPs recent budget cuts and the influx on MFL management plans with the re-entries Priority 1 practices of TSI work and tree planting are still receiving funding. This is also directly connected to PF-3-if enough unengaged landowners start submitting cost-share applications this may change but it is currently not the case. The demand for funding can have an impact on funding at the legislative level. I am not sure if I think this is a good change-dependending on how it is implemented.

Division of Forestry staff

578. The nursery team has concerns about PF5 and believes landowners enrolled in the tax law programs should still be able to receive cost share incentives through WFLGP for reforestation purposes because it may be a disincentive to plant trees without that assistance. Funding reforestation meets the division's mission of sustainable forestry.

DNR Forestry Specialist Teams

579. Agree.

Division of Forestry staff

580. We absolutely should move away from cost sharing MFL plans—at the very least re-enrollments. All these \$\$\$ should go to activities that address the greatest threats to forests—invasive species control being at or near the top.

Division of Forestry staff

581. I agree with financial incentives to landowners to a degree but I think we have gone too far in one particular area. I definitely think we should not have MFL plan development included in WFLGP for payments to landowners. These folks are already going to receive a big help financially once their land is in MFL and the vast majority of WFLGP funds is being eaten away by landowners putting land into the program, just look at the award date spreadsheets from Kathy Hansen. It takes away from other landowners (in the tax law or not) being able to seek funding with reforestation, TSI, invasive control and other projects which are more costly and far more beneficial to landowners' properties and to the overall area. These folks should be getting this financial help, and I have seen landowners' funding get pushed back because of the huge glut of landowners applying for cost sharing for plan development. More specifically with the practice of reforestation if a landowner is not approved on February 1 and they are planning to plant in the end of April they technically will not be approved for funding because they need to pay for trees and planting costs ahead of time (usually in February and March leading up the planting date) and the huge amount of MFL plans sucking up all the money in WFLGP screws the reforesting landowner out of getting help and since they may not be able to handle the costs financially themselves, the project goes down the tubes. I feel this has got to change!

Division of Forestry staff

PUBLIC COMMENTS

582. Since I am currently under the MFL, I would like the WDNR continue to work with those of us who are under the MFL. Just because we signed up for the MFL, doesn't mean we do not need additional forestry assistance anymore. And we do not desire to pay for this assistance any more than the person who is not under the MFL. In fact, I might recommend the opposite in that the WDNR should invest more resources in those that are under MFL since these people have expressed an interest in managing their woodlands in a proper fashion.

T. Kempen

583. Don't agree. DNR should maintain investments to private landowners already demonstrating a commitment to sustainable forestry. Don't shift away from landowners who are already active participants in forest management. If non-participating landowners aren't convinced of the benefits of professional forestry advice through existing programs, they likely won't change their attitudes. The landownership trend is towards smaller parcels with diminishing chance for sustainable forest management. Instead, DNR emphasis should be directed towards maintaining the larger privately owned forests to avoid fragmentation into smaller parcels where landowners hold other priorities above sustainable forest management. Do a better job of maintaining existing active forest landowners in large blocks and develop a strong reputation of forestry services that draws other landowners to initiate requests for assistance. Don't chase shadows.

M. Luedeke

584. Agree.

N. Paulson

585. WWOA has always supported financial incentives as an investment to encourage landowners to practice forestry so we agree with PF-5.

L Hanson, WWOA,

586. I understand the intent here and do not necessarily disagree. However, there are many necessary projects on MFL lands that are virtually cost prohibitive to be effective (e.g., deer fencing, invasives eradication). While MFL owners do receive a tax break, they are also some of the more progressive and active private land managers, but they often do not have the deep pockets intensive projects require. They should not be left without viable cost sharing options. To enhance the public benefits that derive from sustainable land management, we must work to increase the size of the cost sharing pot.

D. Pubanz, Wolf River Forestry

587. We strongly support this proposed change. The American Forest Foundation recently released a report on the impact of cost share programs that are part of the Farm Bill. Even though forests are still only a small part of most farm bill conservation programs, important gains were made since the last Farm Bill and we therefore strongly support providing sufficient resources to meet the conservation needs on family-owned forests. The emphasis by the Division in this proposed change on reaching landowners not currently taking advantage of these important programs is right. Second, finding ways for state investments to augment and leverage federal and private dollars is smart as well. As with the need for partnerships, working strategically to identify opportunities to pool and leverage federal, state and private dollars is essential in a time of strained resources.

J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

588. In PF 5 we recommend the level of investment be increased to help educate non-MFL landowners about the opportunities of forest management rather than selling small parcels. Land ownership has changed over the years through inheritance and many new landowners have not been educated as to the benefits of forest management through harvesting of timber. In many instances landowners are unaware of alternatives to selling property in order to make land affordable and DNR should play a greater role of outreach in educating new owners.

H. Schienbeck, Great Lakes Timber Professionals Association

589. I routinely advise my clients who are applying for MFL to apply for WFLGP funds because they are available. I have no problem with putting a higher priority on using funds for those not in the MFL program.

T. Mulhern Forestry

STATE LANDS (S)

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.

DNR STAFF COMMENTS

590. Let's look at a percentage of timber sale proceeds to fund these properties...yup it will take a statute change.

Division of Forestry staff

591. State lands I agree with we but can become more efficient in operations, particularly integrating other staff and programs (lands, LE). We seem to work in our own little bubble as do other programs. We do not at times mix well causing duplication of efforts.

Division of Forestry staff

592. Overall support to continue investment in managing state owned lands, but efforts should be applied only to those lands where there are opportunities to manage that are non—constrained by master plans or property managers. It is important to maintain a timber program on state lands. A DOF benefit is the maintenance of expertise and for training.

Division of Forestry staff

593. Agree with our role. Agree with all proposed changes except strongly disagree with lump sum sales/consultant hiring.

Division of Forestry staff

594. It seems like there needs to be a specific reference to the increased need/desire to purchase key in holdings - the justification was described on page 18, but not communicated in the proposed changes.

DNR staff (non-Forestry)

595. Agree with our role. Agree with all proposed changes except strongly disagree with lump sum sales/consultant hiring.

Division of Forestry staff

596. Increased funds for reforestation work (especially access to timber sale revenues)... long time coming! Excellent. Reforestation work should be defined broadly enough to include site prep, planting, invasive control, post-sale work and whatever is need to ensure green-up.

Allowable harvest - include a statement that the Division will continue to work to increase the accuracy of harvest projections through master planning and other planning processes. Current allowable harvest goals are inflated due to these inaccuracies.

Division of Forestry staff

597. I agree with this proposal.

Division of Forestry staff

598. State Forest and State Lands management represents a long rich history of scientific applied forest management. It is an important showcase of all management practices that the public and other governmental forest owners can examine and is open for the public to recreate and enjoy. We support and encourage the State of Wisconsin to invest in the resources to keep the State lands management in the hands of our State Foresters. From the inception of Wisconsin forestry, the Star Lake Plantation, NHAL staff has been dedicated to providing sound silviculture practices on the Forest for the past 100+ years. The cost effective use of our State financial resources lies in its employees managing these lands and

the returns have been great. Value to the State is both monetarily to the Forestry Fund and to the natural classroom of benefits of education, sound management examples, and sustainable benefits to the forest ecology. It is the best use of our resources and a good investment to continue to support State Land management with full staffing and budget funding.

Division of Forestry staff

599. Since I've been assigned to the Flambeau River SF, I've watched as LE staffing has been reduced /dismantled. A failure to fill a vacancy created when a fellow Ranger retired in July of 2009, (which followed 1 1/2 years, where this same Ranger was on light duty, due to a serious work related injury) has resulted in a 65% reduction in LE coverage. Now the Forest Superintendant is seeking to reclassify this vacancy to a Ranger/Assistant Property Manager, with only 20% LE duty and in addition, has asked I reduce my LE duties as well. The Forest Superintendant is not credentialed and does not have experience as an LE Officer. In my opinion, the Superintendant does not comprehend LE issues related to Officer safety, Public safety and the benefits of having LE Rangers on the ground in contact with the public, maintaining peace and protecting the Forest. The LE program on this forest is stretched too thin. The remote nature of this Forest and the lack of backup, cell phone service, and lack of reliable radio contact, make this a place where serious safety risks and lack of assistance are frequently considered. Unfortunately, I am now seeing more incidents of vandalism occurring on the Forest and find myself in a position of reactive response versus (the desired) proactive response. I believe this is a product of the reductions in LE on the Forest. If this reduction trend continues, the forest and its visiting public will likely be degraded. I have worked hard to maintain a safe and peaceful property but I'm afraid this is not sustainable with the current reduction trend. A plan needs to be adopted to require these Managers/ Superintendants to be accountable. I believe. Central Office needs to be in a position to more closely oversee what is going on at these forests.

Division of Forestry staff

600. A statement, "Forest ecosystems are always in a state of change", appears on p. 18. This can be misleading if not explained further. When change occurs too rapidly, ecosystems cannot adapt quickly enough and species are lost. The Cutover is an example of a change that was too rapid and drastic.

DNR staff (non-Forestry)

601. The BWM understands the need for the strategic direction statements here and agrees with the overall direction of the Division of Forestry. We suggest that the rationale behind the funding increase for reforestation efforts is unclear in the document, but was made clearer in subsequent discussions with Forestry staff. That's an area for improvement in the document. We appreciate the direction regarding planning assistance for other programs (S-6) as the BWM is embarking on a number of master plans for state wildlife areas that will contain forest habitats. We'd welcome an effort to ensure that recon data is up to date on forested properties so that we can better understand allowable harvests and ecological priorities. In addition, this information will help to assess new markets for woody biomass or carbon storage (UM-1/2).

The BWM also would be supportive of statute changes that would allow the use of timber sale revenues for reforestation; however, we feel that other ecological priorities should be included in the potential uses of this money. Examples would include ecosystem restoration (savanna, barrens, etc.) or needed science that would help us to better manage these properties for wildlife and forest ecosystems.

DNR staff (non-Forestry)

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

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

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

...

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

DNR staff (non-Forestry)

PUBLIC COMMENTS

604. Allowable annual harvests are good. They should be defined for all state lands, even if the allowable annual harvest is zero (Natural areas), so as to let the public and politicians see what forestry and public lands can produce for society.

The Division should not contract with private foresters to conduct state land management. State land management should be priority for state foresters. Proposed increase in funding for forest regeneration on state lands is good.

P. Dayton, Vernon Co.

605. Agree with role and proposed changes, but is there a potential to re-invest all proceeds from management activities on state forest lands, back into state forest lands. These funds should not be diverted or invested in activities other than State Forest management. Consider purchasing less land and investing more in management of existing state forest land.

G. Rebman, USDA-NRCS

606. I support the commitment to actively manage all state lands according to property master plans; to continue to meet harvest goals; and to improve efficiencies through lump-sum timber sales and by contracting with cooperating consultant foresters. However, I am concerned by the references to "ecological simplification"; "under-represented forest communities"; and "landscape scale management" in this section, as these issues typically impede efforts to actively manage healthy forests and minimize forest mortality.

S. Kariainen, Louisiana Pacific Corporation

607. State and county lands play a significant role in timber production and recreational opportunities for Wisconsin residents and tourists throughout the state. The strategic direction should focus on enhancing current recreational opportunities without decreasing the amount of available land for harvesting of timber. Given the fact that green tree retention and areas of little or no harvesting have increased, industry has seen significant changes in the amount of timber being offered for sale. Although it looks good on paper, the amount of fiber from state lands has increased only because of the reduction in the forest harvest backlog. There is and will continue to be shortages of raw material which is currently evident by the high prices being paid for stumpage.

DNR should be expending more funds to research the effects of modern day harvesting and compaction on state land areas that may have been “off limits” in the past. It is GLTPA’s opinion that areas off limits to production in the past due to harvesting techniques may now be doable, which could help mitigate the loss of available fiber due to the above mentioned items. GLTPA feels the division should be committed to increasing levels of harvest rather than being committed to maintaining current levels. GLTPA does support the activities mentioned in S-2 for lump-sum sales and also those in S-3 to increase funding for reforestation.

H. Schienbeck, Great Lakes Timber Professionals Association

608. In the State Lands section of the document we do not agree with the first sentence under Challenges and Opportunities and ask for that sentence to be removed. It is our understanding that this document will be utilized by citizens of Wisconsin and decision makers in our state who are not directly involved with forestry operations. We believe this sentence offers a misrepresentation of the current state of our forests. We offer that our forests today are more structurally and ecologically diverse than they have been at any other time during the past century.

We have been doing an excellent job of managing our forests to increase diversity in structure and ecology. This sentence is negative in nature and makes it sound like forest managers have been doing a poor job over the past 100 years. In the third paragraph under Challenges and Opportunities we request that the language within parentheses be removed. The language is confusing, takes away from the substance of the sentence, and is not necessary.

On page 19 of the document in the first paragraph under the boxed language containing the Division of Forestry's Role the first sentence reads: "Through the master planning process, state forests are managed based on a landscape management approach which takes into consideration any historical issues of simplification and under-represented forest communities." State forests are not the only forests in Wisconsin pursuing the landscape level approach to management. There are several reasons for considering landscape management beyond the one listed here. Therefore, we request that the sentence read; "Through the master planning process, state forests are managed based on a landscape management approach." The remaining language in the existing sentence is unnecessary.

On page 20 the statement under S-3 indicates that state forests offer unique recreation opportunities. We do not disagree with that statement but state forests are not the only forests offering those opportunities and we have suggested additional language to the County Forest section of the document to account for similar offerings that exist on the county forests.

J. Severt, Wisconsin County Forests Association

S-1

<p>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)</p>

DNR STAFF COMMENTS

609. I was happy to see that allowable cut was used as the goal rather than having goals that have traditionally fallen short of allowable cut. The public has much to wonder about if we are failing to meet allowable cut.

Division of Forestry staff

610. This statement is written to imply that it includes other state lands but later they are added as an afterthought under S-6. Other state lands have many of the same problems as the state forests, but less resources for us to work with. Also since we are not the property managers we have a harder time getting permission to do our work.

Division of Forestry staff

611. Support to maintain the investment and continuation of work to reduce backlog and to meet harvest goals.

Division of Forestry staff

612. I agree, this commitment demonstrates responsible goals that are acceptable to the majority of the public.

Division of Forestry staff

613. Agree - this is essential for many reasons.

Division of Forestry staff

614. Agree. Sustainable forest management on all state lands should be a main focus of our attention and an area where we can demonstrate the ability to practice what we preach. We need to be “hands-on” with all state properties and at the table with property managers to incorporate forest management objectives into property master plans. Establishing and meeting allowable harvest goals, along with reducing the backlog of forest management practices are key roles for our forestry staff to be engaged in.

Division of Forestry staff

615. One of the things I hope come out of the strategic direction is a better understanding of what it means to be sustainable. If we had targets for the various age classes and composition of our forests then that would play a role in our current management. One of those would be guiding us in the quantity and type of regeneration that needs to occur. That can then be further broken down to how much of that will be natural regeneration and how much needs to be artificial regeneration, thereby giving Forestry Division a target to shoot for.

Division of Forestry staff

616. Although supportive of S-1 through S-6, I have a couple of things on the wish list that I would like to see. When it comes to S-1 and S-6, one of the keys to effective planning and reaching allowable harvest goals is up-to-date recon. When it comes to master planning - I'm learning, at least on wildlife properties, that the recon data can be pretty old. I would love to see us think far enough ahead and have the resources available to update the recons for master plans one or two years ahead of the plan beginning, just we are trying to assemble Biotic Inventory and Regional Economic Analyses ahead of the master plan. Such a proposal would help with S-1, but may go counter to your interest in decreasing investment in planning as embodied in S-6.

DNR staff (non-Forestry)

617. Using lump sum sales: This may be a viable option for some sales, and I think many foresters are utilizing this method where appropriate. To use a blanket approach or to say we will sell a certain percentage of our state sales this way is foolish. A private landowner would be terribly upset if they sold their wood lump sum and the cruise was off and they ended up losing out on money they should have received for products that they owned. Don't the tax payers of the state deserve the revenue for the total product that they in part own? This holds true for the logging contractor who purchased the products as well. Is it not best for all parties involved to sell and purchase exactly what they intended on purchasing or selling? A farmer does not estimate the bushels of corn or number of bales of hay he will harvest and sell it prior to harvesting it. He harvests the product and then sells the exact amount he has, and the purchaser buys that same amount. The division should encourage the use of using a lump sum sale where the forester feels it is appropriate to do so, and leave it at that.

Division of Forestry staff

618. Sustainable Forest Management on all state lands is a must. We must lead by example.

Division of Forestry staff

619. The annual allowable harvest goals for the last few years on the NHAL-SF have been ambitious. The Forest has only been able to reach the goals with considerable help from staff off the Forest. Headwaters staff time given to the Forest is the only reason goals have been met with our current vacancy levels. If the Division is truly dedicated to the effort of meeting our allowable cut it would seem appropriate to allow our vacancies to be filled as soon as possible. It also would seem appropriate that PD's and goals for Headwaters staff would continue to include hours dedicated to State Forest work.

If backlogged practices are still perceived to be too large there are a number of things which could be done to make things more efficient.

Move staff from lower work load areas to higher work load areas. This could be implemented permanently, temporarily or seasonally.

Encourage and or maintain the practice of establishing large sales. There are ecological and efficiency reasons for having large sales. This needs to be conveyed to the general public and all levels of administration better. Large sales are more efficient with respect to billing, administration, recon updates, and establishment. Large sales mean a speedier reduction of the backlog. It would be nice for decision makers in the field to know which is more important,

reducing the backlog in a timely manner or having more but smaller sales spread around the whole Forest. As our backlog is concentrated in past Wild Areas it is not possible to spread things out and still address the backlog in a timely manner. There are some conflicting directives coming through channels. Areas with recent activity need more. We should not be expected to apologize to the public for sound forestry practices being implemented. The chain of command needs to communicate which is more important, reducing the backlog or trying to satisfy the vocal public minority who are anti-management.

Revisit the self-imposed standard of having recon updated every 15 years in all types. CFI systems are in place on the State Forests which are fulfilling the monitoring role. There is a need to have up-to-date information to make an informed management decision but old data does not necessarily mean bad data. As an example, field visiting and updating every aspen stand on the NHAL-SF every 15 years is just plain busy work. The same could be said for a number of other even-aged types. There is a considerable amount of man-hours put toward this effort each year with minimal gain realized to the overall program. One visit midway through the rotation age would suffice to check the stand for appropriate typing and overall fitness. A more appropriate and efficient recon interval needs to be developed based on type and possibly specific to each property or region. A quicker reduction in the backlog would be the result as we would be able to spend more of our time setting up scheduled stands.

Division of Forestry staff

620. We agree with the current effort to reach allowable harvest goals. This can be accomplished by shifting resources within State government and using very limited amounts of outsourced contracting. Base funding reductions cut into our ability to reach goals and LTE funding levels should be maintained or increased to cost effectively manage and maintain our State lands to current planning levels. The costs of contracting involve the funding of contracts and many hours of valuable staff time to administer these contracts. Cost effective value to the State is better served with most work being performed by forestry staff and LTEs. Workload analysis should produce contractor work that is not being addressed currently or is in an underserved area of the State on scattered State Land management. Only cost effective forestry work should be contracted out to private consultants.

We should be careful to keep control of our work quality and quantity. Development pressures and human activities are impacting efficiencies of forest operations. The science of forest management is also gaining complexity. Professional DNR foresters are needed to plan, manage and monitor the resource management prescribed by modern Master Plans. The outsourcing to contractors will reduce the quality of management results and increase administrative workload for State Foresters to maintain certification standards.

The reduction of the current backlog of forest management practices involves work to get records up to date and evaluation of stands and other background work to prepare for establishment. I believe the Division should be committed and support the resources to accomplish this important workload with DNR staff. The complexities of Master Plans require staff support funding and full staffing levels to follow through with plans and remain sustainable and maintain the Certification standards we are committed to. Input from the public is an important aspect to managing State Properties. Private contractors do not represent the State's interests nor can they articulate this well to the public. Continuity in planning, management and message is important.

Division of Forestry staff

621. I whole heartily agree with remaining committed to current levels of sustainable forest management on all state lands. DNR forester establishment and administration as well as cooperating consultant established sales are both options. I would like to see a cost analysis comparing LTE's hired for timber sale establishment vs. contracting with private consultant foresters to determine if LTE hiring can also be a cost effective and efficient alternative that can be utilized.

Division of Forestry staff

622. Trying to meet allowable harvest goals can sometimes decrease the quality of work in both timber sale establishment and administration. I do not think quality should be lost to quantity. Hiring contractors does not always speed up the process of reaching the allowable harvest goals. Hiring contractors can also affect the quality of timber sale establishment and administration. If the DNR foresters' expectations are considered too high, then the Division needs to tell them where their standards need to be lowered.

Division of Forestry staff

623. Great to see we will keep this commitment. The current backlog can be addressed by being more integrated and using our employees to get the objectives accomplished. Keep our work within the Department.

Division of Forestry staff

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

...

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

DNR staff (non-Forestry)

625. We support continued commitments to sustainable forest management on our state lands; we would like to address more specifically the need for increased post-sale support and adherence to BMPs such as conducting harvest over frozen ground (i.e., issues with post-sale invasives control, slash, etc.).

DNR staff (non-Forestry)

626. S-I: Agree, but The DOF is not the land manager for several of the other state land properties. Need to find a method to get the land managers to agree with this proposal.

Division of Forestry staff

PUBLIC COMMENTS

627. The Paper Council is in general agreement with the proposed changes related to state lands. More specifically, the Division of Forestry's commitment to "current levels of sustainable forest management on all state lands as identified in property master plans" and the commitment to "continue to meet allowable harvest goals" (S-1) are welcome statements.

E. Gustafson, Wis. Paper Council

628. Strongly agree to invest resources to meet desirable harvest levels and reduce harvest backlog on State lands. Meet obligations as defined in Master Plan and as budgets allow.

M. Luedeke

629. It is my understanding that the Division does not meet the annual harvest goals for State Forests and other State lands that have Management Plans. If not, this should be an increase item.

What are the backlog forest practices referred to?

The Division needs to start using economic and social expertise as well as resource expertise in making decisions. The socio/economics of our Northern areas requires a lot more analysis and understanding than the IMPLAN Model produces.

N. Paulson

630. Under state lands we aggressively support current efforts for present harvest goals to maintain forest management (S-1).

L Hanson, WWOA,

S-2

Proposed Change: The Division will increase the number of lump-sum timber sales. Where cost effective, the Division will contract 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)

DNR STAFF COMMENTS

631. Increasing the number of lump-sum timber sales and using cooperating foresters to establish timber sales on state lands.

Division of Forestry staff

I believe lump sum sales may be appropriate in some cases, but not many. Look at the numbers from Jeff Barkley and we've seen similar numbers in our county. Do we want to give away that 10-20% overrun we are seeing? Even if you utilize lump-sum you still need to go to the site to answer questions, check on roads, etc. So are our administrative costs on regular sales really that much higher?

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As far as having cooperating foresters doing any part of a timber sale, that makes me feel angry and disgusted! I have already had comments from loggers and well as "cooperators" like, "can't the state take care of their own land?" Or "doesn't the state have foresters capable to set up sales?" The one use I can think of for using private individuals on state lands should be for survey work and establishing and keeping up boundary lines, which would be very helpful. Like I said above in PF-2, we need to keep up our competence levels high in all aspects of forestry, especially timber sales. How can we be looked at as "experts" of even knowledgeable if we are not given the opportunity to work on timber sales, MFLs, etc? I feel as more and more of our old duties are taken away or reduced our technical abilities and experience is significantly reduced. We (DNR foresters) need to have experiences in all parts of the MFL process as well as other processes we are constantly being asking about by landowners, like timber sale establishment and administration, etc.

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I guess keeping these duties may increase our investment in this area, but what are consequences of handing over more duties to the private sector? How much money is really saved? What is the cost of us losing training opportunities and experience in our "field of expertise"?

Division of Forestry staff

632. I agree with this but lump sum timber sales should be monitored to ensure that overall sale revenue is not compromised by this sale offering. To elaborate, offering lump sum sales puts a greater risk on the timber buyer, who will in turn lower their bid due to the uncertainty of the timber quality. The reduction in this bid maybe greater than the cost of administering scale sales.

Division of Forestry staff

633. I am not stating we should not do Lump Sum sales I am stating that they should only be done where deemed appropriate and where they represent a true cash savings to the Department. I seriously doubt there is any savings to our operational budgets to use lump sums and I certainly believe it would cost us a considerable amount in timber sale revenue. The assumption behind the idea of it being a cost savings is not backed up by any data I have seen.

Division of Forestry staff

634. Lump sum sales? Bad idea. This will NOT save money and will actually erode much of what needs to be taking place as far as administration. What are our costs to run a sale from start to finish? I believe Ron Z. will be sending you data on this but it's about 10+% sale value. With lump sum, we might save one or two trips to the site, that's it. We would even increase cruising time necessary to try to get a more accurate estimate. I've been closing sales out for years.

With an occasional exception, we ALWAYS cut more than the estimate. Barkley sent data to indicate this is around 10%. Putting in more plots will not eliminate this, guaranteed. Sidenote: If you can accomplish one thing, have the Division netting the timber sale revenue actually pay for the support. Forestry pays for all of the mileage, meals, and in most cases paint, for state sale work on fish and wildlife properties while the revenue goes into their own seg accounts. Are you kidding me? This seems like it could be rectified with a simple stroke of a pen and yet forestry just keeps sucking up the expense. Change this.

Division of Forestry staff

635. As a DNR Forester involved in state lands management for more than 25 years I do have a significant concern related to some of the proposals relating to the management of state lands. Of particular concern to me is item (S-2) pertaining to the use of consulting foresters to establish timber sales on state properties. I understand that the effectiveness this proposed change is currently being evaluated and I will be interested in seeing the conclusions of this study. As we attempt to do more and more with our limited resources I grudgingly accept that increased involvement of the private sector may become necessary. I do, however, feel that the use of private consulting forester for timber sale establishment on state properties is not the way to go. Timber sale establishment on our properties has become incredibly complex and is perhaps the most critical work we perform in our profession as state lands foresters. I feel very strongly that it would be a mistake to turn this work over to anyone who has not had the full benefit of our knowledge, training and experience in state lands management. The large amount of DNR oversight required and the complexity of the needed contracts to accomplish the contracting of sale establishment would negate much of the benefits of this action. Furthermore, it is very unlikely that the timber sales established through the contracting of consulting foresters would be of the same quality as sales established by our own personnel. I believe that a more efficient use of consulting foresters should be considered. Currently, administrative code lists "forest reconnaissance leading to timber sale establishment" as a task eligible for contracting. Unfortunately, this has generally been interpreted in a manner which prohibits the hiring of consultants to do routine recon updating. I would suggest that changes be made to allow timber sale proceeds to be used to hire cooperating consulting foresters for the purpose of conducting reconnaissance updating of a more routine nature. This work, while very important, does not require the high level of knowledge and expertise as does timber sale establishment. In addition the contracts required to accomplish this work would be simpler and less time consuming to administer than those required for sale establishment. This routine recon updating provides the basis for the scheduling of all timber management activities on our properties and; therefore, does lead to timber sale establishment. Currently our own personnel spend a large portion of their time doing this routine recon updating. Indeed, in recent times, many of us spend the majority of our time doing routine forest reconnaissance. Allowing consulting foresters to perform a portion of our routine recon updating would allow our own personnel spend more time working on timber sale establishment. I believe that this change would be a major step towards the objective of meeting our allowable harvest goals on state lands while retaining the quality and integrity of our timber sale program.

Division of Forestry staff

636. It states on page 19 that there will be more lump sum sales on state lands to reduce administrative costs. There is no study that shows this to be true and many of us feel this will cost us additional money. Timber sales will still need to be checked as often as ticket sales and perhaps more. The minimal time savings gained by not having to check log piles to determine if they are being separated properly will be negated by the additional checks to make sure extra wood is not being cut. A lump sum sale is an incentive to cut as much wood as possible because everything extra is profit.

A second more serious problem is that lump sum sales will likely result in less timber sale revenue. The Black often underestimates the amount of volume present on sales. Had we used all lump sum sales in 2010 we would have had \$117,000 less in revenue using a 10% average cruise underestimate. What does it cost the Black to have a part time LTE to handle all administrative bookkeeping related to a sale - about \$6,000 a year - a real pittance.

To use lump sum sales will require additional cruise plots which also has a cost to it. I would recommend that the language be changed to something similar to the contracting language where lump sum sales will be investigated as a tool to determine potential efficiencies and be used where deemed appropriate.

Division of Forestry staff

637. Lump sum sale are not the way to go. Yes you save time in not processing tickets or scaling wood, but you still need to go and check on the sale for contract violations, BMP issues and problems. If you had to scale some wood it is not

that much more time and money to do so plus you have a better eye on the sale and what is being cut and what is not being cut.

Hiring cooperating foresters to work on state land is a bad idea. State foresters on state lands. I would think that a priority for the state would be to maintain the forest it owns in a healthy vigorous state as a model for the private sector. By allowing private foresters in the door is open for bad and unsustainable practices to be used to make more money. With contracting you still need to administer the contractor to make sure they are not doing some of these unscrupulous practices. With cooperating forester involved the administration cost go up due to all the checking up on them you have to do, the MFL program is proof of that. If an area is not meeting their goal then people need to be shifted around to help. It has worked very well in my area and all priority is still done.

638. Why can't timber sale funds be used to help pay for the timber sales? There is talk about using the funds to pay the contractors why not allow 1-2% of the sale total be given back to the stations budget that set up the sale? This would help with the cost of the sale.

Division of Forestry staff

639. In many cases admin of contracting sales to consultants would take almost as much time as doing the sale ourselves. Lump sum sales are good too, especially once we get better at our estimating volumes.

Division of Forestry staff

I have another quick comment concerning the State Forest Strategic Direction. It has to do with contractors and lump sum sales. I recommend a change in the way it is worded : "The Division will increase the number of lump-sum timber sales. Where cost effective, the Division will contract 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." Change to The Division will increase the number of lump-sum timber sales and work collaboratively with private consulting foresters in maximizing DNR's ability to accomplish workload priorities across the Division, where cost effective. If the new Administration and Division is aligned with basing their management decisions on maximizing the rate of return on investments we should consider the use of contract foresters also.

Division of Forestry staff

640. I agree with using some lump sum sales where practical but not on every sale. Up here on the NHAL S.F. we have sales ranging from 30 - 600 acres and larger. Using Jeff Barkley's + 8% average timber volume overrun on State Sales as an example. A \$150,000 dollar sale is really cutting out at \$ 162,000. That's \$12,000 of lost revenue because we did a lump sale. Lump sums have a place on smaller uniform timber types that are miles from the office. I would prefer mill tickets as the wood is typically accounted for. More cameras and LE time early on will deter timber theft issues. Lump sum sales have their place but on smaller sales not large ones.

Division of Forestry staff

641. Limited support to increase lump sum sales but to keep the option to use this where appropriate. It is questionable whether lump sum reduces administrative costs. (+) was that there is increased utilization and less need to modify contracts to sell other products. (-) was that there is a need for a more exact cruise, field check time equivalent to non-lump sum sales (i.e., green tree retention), and the amount of money the contractor has to pay on the front end. There was consensus that the archaic tracking and invoicing methods currently employed in DOF timber sale administration is inefficient and antiquated. Improvement in this process would make overall sale administration more efficient. It was also clearly expressed that contracting should be reserved for activities such as forest RECON and in instances where a property manager is using a harvest to do a land type conversion (forest to grass). There may also be some opportunity to redistribute some positions such that they are just responsible for forest RECON statewide (Inventory foresters of past).

Division of Forestry staff

642. I think there is some confusion among the public as to why, or if, we should use private consultants to assist in managing public resources.

Division of Forestry staff

643. Agree with lump sum - this is a very good and easy way to reduce a lot of administrative time for sales. I am not sure if loggers who are increasingly paying for stumpage on a deferred basis - will like having to lay out money ahead of

cutting and hauling products though. Strongly disagree with contracting timber sale work -- except in some very extreme situations - I do not believe that this is the most efficient way to establish sales. The amount of effort that would go into pre-establishment and checking of contractor's work are both big chunks of time and many times would probably be comparable to the time needed to establish a sale exclusively with DNR FTEs or LTEs. I do believe where back logs exist utilizing LTEs who could work with a variety of professional foresters to help accomplish some of the field work would be an excellent way to address backlog and work efficiently. Also - FULLY integrated division should help address much of the forest management with Fire personnel during the non- fire season. As a matter of principal too - I think it is essential that DNR foresters continue to establish timber sale - and if we don't do it on Private lands, and we may reduce it on county forests, and we are proposing to reduce it on state lands --- WHERE should we practice our Profession. I think we lose credibility with our partners and customers if we "regulate" forest management in our state without ever "practicing it" ourselves.

Division of Forestry staff

644. Disagree. I do agree with the increased emphasis on use of lump sum sales but not with the increased use of private consulting foresters to establish timber sales on state owned properties. Again, our forestry staff should focus attention on our own lands and should be actively engaged in forest management related activities, including timber sale planning, establishment and administration. These activities should not be farmed out to the private sector as they are at the heart of what we should be doing as state foresters. If anything could or should be contracted out it would be more appropriate to contract for non-commercial activities such as TSI, other cultural work, invasive species control, or tree planting. I would propose that any necessary increases in DNR forester time spent on state lands management could come from reallocated fire management duties.

Division of Forestry staff

645. Disagree with the practice of contracting with pvt. foresters to do state land timber sales. Contracting with consultants should be focused on recon collection with timber sales left in the hands of the state foresters. Lump sum sales are not the answer and may make sense only in specific instances, i.e. sawlog sales where 100% tally is done. Lump sum sales should never be used in pulpwood sales - the state will lose money as most sales are under-cruised in my experience. Also, lump sum sales will save time in scaling but doesn't eliminate sale administration time of having the forester on the ground while the job is being cut.

Division of Forestry staff

646. Lump sum sales will encourage increased utilization by the logger. If the logger pays for 600 cords he'll be motivated to get 600 cords . . . plus some. It will be harder for foresters to work with loggers to ensure loggers are leaving the required CWD and snags that forest certification requires.

Loggers don't want the risk. There are loggers in our County who do not want lump sum sales. Small loggers do not employ foresters. They look at timber tracts themselves if they can find the time. They do not want to be exposed to the kind of risk lump sum sales offer. It's tough for small loggers right now. We need to have as many operators as possible in the woods and not have a few large firms dominate the bidding process.

Foresters have less flexibility with lump sum sales when the sale is being cut. At times, for one reason or another, small amounts of timber are added or subtracted to a harvest once cutting begins. (Examples: 1. A hawk's nest or wolf den is found inside the harvest area and needs a no cut buffer added. 2. A small area of blow down has occurred / found next to the harvest and is added into the harvest area. 3. A property manager sees something they like or do not like about a sale and needs the sale changed - perhaps they want a harvest edge feathered.)

The State will be giving money away. The Black River State Forest sold over \$1,200,000 worth of timber last year. If that was under cruised by ten percent the State would lose out on \$120,000. That's just one property. Consider if this was done on a majority of State sales. Taxpayers don't want the State to give timber away.

Lump sum sales don't save much time or money. You still have to be present on the sale on a regular basis to inspect the cutting boundaries, rutting, utilization, green tree retention etc., and your cruise would take more time due to increased sampling. The administrative costs that are saved through lump sum sales just aren't that significant. It doesn't take that much time in the office to administer a timber sale (i.e. the "bookwork and accounting" paperwork.)

There's a potential it could hurt the Department's reputation. Ex: A timber sale was over cruised and a small logger loses out on \$4000. Not a huge amount of money in the big picture of timber sales, but a lot of money to a small business owner. Does the State tell the logger, "Buyer beware. You should have cruised it yourself."? Now, the State took the small business owner's money. There's a potential for bad press and bad relationships.

Contracting out timber sale establishment. When a sale is contracted out it still takes time and effort by the State forester. The sale area needs to be located and inspected, a harvest prescription determined, contractors sought out and met with, the work needs to be inspected etc. After the effort you could almost have set up the sale yourself. However, having the option / ability to contract out timber sales would be valuable in certain situations. Ex: A forest has a jack pine budworm outbreak and there are staff vacancies. The ability to contract out work in this situation would be valuable.

In conclusion, the more I think about lump sum sales I don't see the benefits. I would hate the Division to make a broad decision and state that 20 percent of State sales will be contracted out and 10 percent will be lump sum without good reasoning and data to support the decision.

Division of Forestry staff

647. As for the idea of utilizing consultant foresters to establish state sales, NO! State employed forester should be the only folks establishing sales on state land. That is our job. An electrician doesn't hire another electrician to do work on his own home if he is too busy to do the work himself. The work either gets put off or other work does not get done so he can work on his home himself.

Division of Forestry staff

648. There are only so many work hours in a day, there are lots of services we should and can provide to a wide array of customers, but we still can only get so much work done. It becomes a matter of priorities. If making sure our state lands recon is up to date and that we are meeting our allowable cut, then so be it. That then should be #1 priority and other work gets diminished or set aside for a bit. Shift resources to accomplish this. Some of our cutbacks should include: 1. not giving so many hours to the county forests, 2. not immediately working with a private landowner and referring them to a cooperator. The only work I see appropriate for cooperators to do on state lands is surveys and possibly recon work, only if DNR staff cannot get that done within 5 years.

Note: Good, but need to refine inventory systems to reflect modern forest inventory capabilities. Lump sum sales rely on the accuracy of the sale volume estimate to return value to the State. The paper industries switch to weight scale has exacerbated potential error in sale volume estimates. Before adding more lump sum sales, steps need to be taken to upgrade the quality of State land timber sale volume estimates.

Division of Forestry staff

649. The proposed changes are to increase the number of lump sum timber sales, and to increase contracts with private cooperating consulting foresters where cost effective to establish a portion of timber sales to accomplish workload priorities. I will address the pros and cons of each of these proposed changes separately and why I am opposed to increasing lump sum sales and increasing contracting out with consultants.

Lump sum sales may seem like a good idea to decrease administration costs associated with billing for mill tickets and/or scaled sales. It is true that there would be less administrative time in the office in dealing with mill tickets and billing, and less time for those that hand scale wood in the field as well. However, there would be many negative economic and ecological effects from this that would actually increase costs including:

1. Increased sale establishment costs (increase in cruise accuracy) and higher economic risks to the state and loggers - Most of our sales being cut are 10 - 20% off of the volume estimate or even further off sometimes. Even with more cruise points the variability in stands and variability with how different loggers utilize trees makes it very unlikely that we could get much better cruise data anyways. This 10-20% figure on 1 average sized (80-100 acre) timber sale alone if underestimated, would pay for our clerical administrative assistant to do billing for an entire year! If we overestimate, the logger will have to absorb the loss, putting them at higher risk and more dependent on our estimated cruise volumes. Most loggers in our area do not have time to cruise timber separately, further more even take a look at our sales before bidding on them. I have talked to loggers in our area about lump sum sales, and all are opposed to going to this method because of the increased economic risks. I think this could lead to more small time logger's being bankrupted for possibly

overbidding on just 1 sale that we may have overestimated. Also, if we sell by lump sum, we would no longer know what volumes are actually being cut, so it would be difficult to know whether our cruise was accurate or not.

2. Negative ecological effects associated with lump sum sales and increased sale administration in the field - When selling by lump sum, the logger has every incentive to take as much wood as what was advertised to make the most profit. This will inevitably result in less slash being left on our sales because they will push to get higher volumes. This is troubling to me because most of the soils on this State Forest are very poor and are not capable of biomass harvests under our new guidelines. Also, in regards to the snag retention guidelines we have, loggers will be inclined to cut any tree they can sell including dead wood, which will result in even less snags being left on sales and less coarse woody debris. The increased incentives for loggers to utilize more wood for more profit will also result in more time for DNR foresters to administer sales in the field and to make sure the logger is not taking additional live trees, dead trees, or over-utilizing on poor sites. Cutting too many snags/dead trees is already an ongoing issue we have with loggers and selling sales by the lump sum method would make this issue much more difficult to deal with as there would be new financial motives for doing it.

I think a better approach to cutting our administrative costs rather than lump sum sales would be to look at properties that are still stick scaling pulp or bolts/logs in the field and encourage them to go with the ticket system for all products. This would save a tremendous amount of time that is being used for scaling in the field and allow much more time for things like timber sale establishment. I don't see any reason for state properties to mandatorily scale wood on the landing when both the state and logging companies can receive an independent 3rd party scale from the log or pulp mill (i.e. we get paid based upon the volume the logger gets paid for).

Contracting with Cooperating Consulting Foresters: This should only be used to aid in reducing a large timber management backlog that a property has if they so decide to choose this method. Contracting with consultants requires much additional DNR forester time in bringing new consultants up to speed on how we do things, office administration with advertising and contracts, and increased administration time with field checking the consultant's work. This is all time that could be spent in establishing the timber sale ourselves. I have heard people say that "things will get better after working with a particular consultant for a while." This may be true in some cases, but there are no guarantees as to what consultant you will get in the bidding process. In our area there are continuously new consultants coming and going and I would suspect we would be working with new people all the time. Also, I think contracting with consulting foresters is going to prove to be much more expensive than just hiring a temporary LTE to help with reducing a property's backlog. I think hiring an LTE is a much better approach to help with decreasing a backlog for numerous other reasons as well, which I won't mention here. There are also silvicultural conflicts that can arise with contracting with cooperating foresters that work for a logging company or paper mill that have a "certain agenda" for bidding on the sale. These consultants may be pushed to do things a certain way to benefit their company rather than practice good silviculture. Overall, I only see contracting as a tool DNR foresters should be able to use to help in a backlog situation and not as a "mandatory practice" to get our work done.

Division of Forestry staff

650. Lump sum sales can be used in flat topography, monotypic stands like aspen or jack pine. In most of my country where hilltops are different timber types and densities than hillsides, than valleys - our cruises are just not that accurate to sell sales like this. Being stewards of public land not only should be implementing good management of the resource, but it should be getting the highest rate of return for our clients - the taxpayers of the State. It doesn't and can't happen with lump sum sales.

Funding Consultants for state land work? What is going on now is a \$\$ shell game. Consultants hired for state land work cost us more money than they save - with our administrative oversight costs. We are raiding forestry dollars from a different place in the forestry fund to save our operating budget expenses. Bottom line is this is costing the taxpayers more money than it used to. Get vacancies filled instead! If we are hitting allowable cut, please don't make us contract out work on state land.

Division of Forestry staff

651. I am beginning to strongly doubt that lump-sum timber sales will save the Division money, especially in marked thinning harvests; or in high quality timber stands. There are many reasons why...I won't go into detail but I would discourage this as a way to save money. STRONGLY encourage finding a way to fund the use of land surveyors for property line establishment for questionable lines on timber sales...somehow tied in to S-5.

Division of Forestry staff

652. I am neutral on the idea of the use of cooperators to set up our state lands timber sales, although it may be a nice tool to have in the tool box when needed. Lump sum timber sales should be increased since this puts more responsibility on the timber buyer up front and creates less administration on the back end. **Division of Forestry staff**

Disagree Over seeing contracts with private consulting foresters has proven to be costly and time consuming. These are remote work sites that take time and effort to reach and are more efficiently done with state employees. Lump-sum sales are not the cure all with highly variable timber types and sizes. There is more risk for the logging contractor and the state could be involved in more contract disputes.

Division of Forestry staff

653. The use of lump sum sales is not a very cost effective way to deal with state land timber sales. As a small error in volume estimate can cost the state a lot more revenue than the cost of administrating the sale. A lock box and a trail camera provide a very effective way to limit trips required by a forester or technician to administer the sale. There are some loggers who will not even bid on lump sum sales as they have been burned on volume estimates. Then there are some loggers who will bid based on the forester who marked the sale. They typically will blow other bidders out of the water because they know the forester under estimated the volume. So you may reduce administrative time, but the loss of revenue to the particular program will be increased. After 18 years I have observed these issues constantly on lump sump sales. The use of lump sump sales is a quick and dirty way to handle sales and has the perception of being used by lazy foresters. Save lump sump sales when a stand needs to be harvested in a short time, such as storm damage or insect issues.

The use of cooperating foresters will also result in the loss of revenue to programs. Their cost will be higher and you still have the administrative time to verify the marking and prescription. That higher cost will come off the top of the revenue received from the sale.

It seam that if we are reduce the number of hours foresters spend marking on county forest, that time could be shifted to mark state land sales. Establishing state land marking camps by areas seams to be a very effective way to get a lot of acres marked fairly quick.

Division of Forestry staff

654. Increasing lump sum timber sales will help decrease time spent on administration of scale tickets however it will take longer for establishing timber sales. Lump sum sales do not need less administration on the ground only less time in the office with tickets and invoicing stumpage.

Division of Forestry staff

655. State Lands lump sum sales may not save administration costs. While lump sum sales may be worth trying on a trial basis, it is important to remember that there are multiple reasons for timber sale visits/administration beyond accounting for cut products. How many of the items on a timber sale site inspection sheet relate to accounting of cut products compared to care of the site issues such as water quality BMPs, certification issues, etc.

Division of Forestry staff

656. Lump-sum sales have their place and should be utilized when appropriate. It would not serve the resource well to greatly increase this method or to some day require the majority of the sales to be sold this way. If we continue to get the number of bids on our sales as in the past the State will be getting what the wood is worth and is not at risk of being shorted. For advertised sales with numerous bids sold lump-sum the volume estimates and species/product combinations on the prospectus are less meaningful. Cruising standards should be more stringent for direct sales sold lump-sum and not all sales in general.

There are many options open to management to address the workload some have been implemented others have yet to be proposed. The current practice of contracting through private consultants at first glance does not appear to be in the best financial interests for the people of Wisconsin. If in the end it costs more to contract the only reason left to continue down that path is political. There are other issues within the Department where politics rules the day and not necessarily science. If this is one of those just tell us so and we will move on. We have a highly trained, experienced, and educated

workforce within the Division it seems we can do the job in-house for much less than the contractors. The Division allows compensatory time to be earned for fire control duties and tree planting efforts this could be expanded to State Forest work as well. A cost-benefit comparison of having the work done in-house by our folks earning comp-time for their extra efforts verses a private contractor needs to be addressed. If the Division is truly committed to reducing the backlog and meeting our allowable harvests earning comp-time for State Forest work should be on the table.

Division of Forestry staff

657. Lump sum timber sales should be used judiciously on appropriate sale size and uniform timber types to accurately reflect timber sale volumes. Increase in the number of lump sum sales should be applied in situations that save mileage costs, staff scaling and billing time and are smaller monotype acreages to accurately estimate values. This additional accuracy takes more up front staff time to save time in scaling, billing and close out of the sale. Not all sales are appropriate for this method of sale. Competitive bidding increases lump sum bid prices and obtains fair value for the State. Lump sum sales are a good tool to reduce some costs of the timber sale program.

Using private sector forestry consultants should be limited to cost effective projects that gain value to the resources of the State. These can be applied to the more mechanical process of the complicated timber sale workload. The use of private forestry consultants in parts of the timber sale program should not tie up large amounts of staff time. This only adds extra costs to their work and prohibits staff from performing their own workload on timber sale establishment and recon. The costs of contracting involve the funding of contracts and many hours of valuable staff time to administer these contracts. Cost effective value to the State is better served with most work being performed by forestry staff and LTEs. Workload analysis should produce contractor work that is not being addressed currently or is in an underserved area of the State on scattered State Land management. Only cost effective forestry work should be contracted out to private consultants.

Division of Forestry staff

658. I believe that all types of timber sales have a place when it comes to the establishment and administration of timber sales on state lands but I would be strongly opposed to limiting timber sales on State Lands to lump sum sales. Although there may be additional administration costs with scaled sales compared to other types of sales I truly believe that Mill Scale Ticket scales are an effective and efficient sale method that is the most equitable to all parties involved. A quick analysis of timber sales I have been involved with on State lands shows administration costs to average approximately 7% (this is a high end estimate) of the total sale value. Actual costs are really lower considering I assumed highest mileage rates and highest "hourly plus benefits" data to arrive at that figure. Lump sum sales will not eliminate all administration costs. Sale visits are still conducted to ensure contract compliance and monitor sale progress. The bottom line with scaled, especially mill scaled sales, is that the state and logging contractor are paid for on the same volume basis. Scaled sales also allow for frequent communication between the logging contractor and forester which helps foster a good working relationship. In addition, scaled sales allow for flexibility during harvest operations to adjust harvesting parameters if conditions warrant such changes. With weight scaling becoming more of the standard when it comes to volume determination the mill scale ticket system is again (in my mind) the most equitable system available as the weight of wood varies depending on time of year, rainfall amounts, soundness of timber, etc. Even with advances in timber cruising data shows that we routinely underestimate sale volumes by 10+%. Again, I am not opposed to utilizing lump sum sales as the opportunity allows but I am opposed to lump sum sales being the only type of sale that can be utilized on state lands. Let's be flexible as we consider the various sale types to utilize.

Division of Forestry staff

659. The division should only increase the number of lump-sum timber sales where it is cost effective. The state does not have an accurate cruising system. ESPECIALLY, in northern hardwood stands. The standard that we cruise to for lump sum sales "should" be provide an accurate volume but since northern hardwood stands are so very variable. The volumes NEVER come out to what is actually harvested. On the Flambeau our volumes are always off. I believe that other state forests also have issues with their volumes in hardwoods. It would not be cost effective to do lump sum cruises on northern hardwood stands. It may save money on the scaling but in order to make up for some of the loss in volume we need a system to cruise that is accurate. Or we need to keep doing what we are doing and sell our hardwood sales on scale tickets.

...

“Where cost effective, the division will contract 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.”

There are two very important items in the above proposed change. The first item is cost effectiveness. Cooperating foresters need many things prior to starting up work with the department that the department forester needs to organize such as a contract, work standards, maps, data, mailings, purchase orders, and process. Following the start up work there is the administration costs answering questions, explaining process, checking on field work, and checking data collection. Following the work there is the payment and closing of the data. All of this work could be eliminated if the work was conducted in house. Foresters, Technicians, and LTEs (with training) would be able to conduct the work that we contract out without the extra work of administering for a contractor.

The second item that needs to be addressed in this proposed change is the portion about maximizing the DNR’s ability to accomplish workload priorities across the division. Why would we take time from foresters to develop contracts and administer them when they could be doing the work? Why would we force those employees to veer from what they are passionate about and switch to becoming a regulator? I understand that if workload priorities of the division can not be met that need to be met by someone. But I don’t think that it is good policy to take more time from those that are already pressed for time to complete their priorities and make their priorities writing and administering contract work that could be conducted by them. State forests have been suffering this past year without LTE’s. The workload is heavy and quality suffers because of it. Not all contractors are created equally. The quality of work that is produced by contracts varies greatly. The quality of work that foresters are producing suffers because of time constraints.

Division of Forestry staff

660. The first sentence needs to include the phrase “where cost effective”. I question the accuracy of the cruising system for lump sum sales. The accuracy may not be a factor if there is a lot of competition for the sales. However, the state could lose money when there may be just 1 or 2 bidders. I don’t believe contracting with cooperating foresters can be cost effective, especially when the DNR forester puts in time for setting up the contracts, checking on the consultant foresters, working out conflicts, and sometimes having to train them. One poor qualified consultant can be a huge workload issue to a forester.

Division of Forestry staff

661. Good idea to up the Lump Sum sales---but volume cruise should be at higher confidence level. DNR foresters can accomplish state land timber sales—we may need to shift personnel to do it but this is vital to us as foresters to actually practice on the ground forestry and not admin the consultants work. DNR doing the work keeps our skills in tact and refined ---spending the actual time on the ground is critical to this. WE CAN DO IT...

Division of Forestry staff

662. Privatization in the Private Forestry program was initiated for a number of reasons including freeing up time for other priority work including state lands management. Now that same privatization argument is given for state lands to do other workload priorities??? I think we better reevaluate manpower and PD’s internally before we privatize state land management. On a related note, you may be robbing Peter to pay Paul, shifting consultant work from private to state lands instead of expanding capacity.

Division of Forestry staff

663. I think lump-sum should be used lastly when determining which method to use for payment on State Lands. If a forester is very confident in their estimation abilities then its definitely more of a possibility for use. Scaled sales are most effective when quality the wood going into the log pile is in question because you can be way off in cost estimates and that can negatively impact the state or the contractor when the final volume print out comes back from the mills. If you’re dealing primarily with pulpwood then I see it as an acceptable practice, but the opportunity to use scaled sales should still be an option.

...

(We should not be giving away more work to cooperators! Especially work on our lands. We have a strong workforce of foresters, Rangers and techs, and if we need to utilize more help in surrounding areas then it should be done. I particularly am very willing to help keep work in the DNR. A push to further integrate our Rangers and Techs will provide more opportunity to get this work done. When snow is on the ground for 4 or 5 months in the year in a given area, that’s the

best opportunity to have Rangers and techs get out and help out setting up and administrating State sales. Fire shouldn't be the only job, especially when fire season is no more than 3 or 4 months even in the worst years and most fire prone areas. Integration is key to accomplish these goals.

Division of Forestry staff

664. The use of "lump-sum timber sales" will increase (p. 19). I would like to see a short description of how a lump-sum timber sale differs from other sales, why it would cost less to administer, and the pros and cons of increasingly using these types of sales.

DNR staff (non-Forestry)

665. S-2: Disagree. Lump sum sales are going to take more time to set-up to ensure there is precision in the forest products volumes on the sales. Also lump sum sales do not "force" the forester in charge of the timber sale to visit the sale when it is being harvested. By having a haul ticket system in place with a pay as you harvest, "forces" the forester in charge of the sale to do diligence. There are too many variables with a timber sale to be left unchecked during the actual cutting of the harvest. Also, disagree with consultant foresters setting up sales on state lands. Not an appropriate use!

Division of Forestry staff

PUBLIC COMMENTS

666. We repeat our concern again in this section with references to landscape management approaches. If this implies cooperative, collaborative efforts to attain voluntarily efficiencies or synergies across public and private properties, this should be a benefit. If it is a euphemism for coercive approaches to resource management, then it is a concern (as referenced in our comments above regarding Counties and Privately Owned Forest Lands). Clarification of intent in all sections should be incorporated in the final Strategic Direction document.

Gustafson, Wis. Paper Council

Strongly agree with increased use of lump-sum timber sales as a tool to meet desirable harvest levels on State lands. This decision increases sale preparation efforts to consistently estimate volumes but reduces sale administration and tracking of scale slips that report wood volumes removed. This may enhance woody biomass market development also.

I don't support increased use of cooperating foresters to establish harvests on State Forests. This undermines the morale of DNR foresters assigned to these properties and requires contract administration of cooperating foresters to assure performance to contract requirements. Instead, direct cooperating forester capacity to meeting the harvest needs on private forests where DNR already has limited authority to appraise and administer timber harvests.

M. Luedeke

667. Agree. Just need to do the field work correctly.

N. Paulson

668. We also agree with S-2 since that should increase assistance to private woodland owners.

L Hanson, WWOA,

669. I strongly advocate for lump sum sales as a means of reducing administrative costs. I have used them numerous times in my career and they are very effective. I don't buy the argument that the increased time spent to obtain more accurate cruise data will offset the time savings in sale administration.

I do not agree that the Division should contract with private consultants to set up timber sales on state lands except in cases where DNR cannot meet allowable cut because of other higher priority workload, vacancies, etc. I think state land timber sales are DNR work and should be handled by DNR foresters where it can be. I believe that consultant foresters need to focus on the tremendous amount of private lands work that is available. I am concerned that some consultants will look at state land timber sales as "guaranteed work" and forsake private lands work to work on state lands. Who wouldn't want the benefit of establishing a timber sale without having to do the administration?

I also feel that public land timber sales are more complex than private sales. I would be concerned with state foresters having to do all the presale work to meet certification requirements and then hire a consultant to come in and mark the stand. In the total scheme of a timber sale, the actual marking is minor compared to the rest of the sale establishment.

I also see this as a huge morale issue for DNR foresters that in my mind is not worth the time savings of not having DNR do the entire job.

T. Mulhern Forestry

S-3

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)

DNR STAFF COMMENTS

670. Not just for tree planting, we need the money for invasive and other TSI.

Division of Forestry staff

671. Reforestation question on increasing the amount of funding. This also seems to be in a bit of contradiction with (N-1). There is also question as to whether we are not reforesting properties the state owns where appropriate. There is also perception that this increase is a reverse subsidy to the nursery program.

Division of Forestry staff

672. Finally, I think it would be wise to enter into discussion with legislators and our internal DNR Partners regarding the funding of forest management activities on other DNR program lands. These activities accomplish many non-forestry objectives, support local wood using industries, and create jobs (that is why we should be managing these properties). Each DNR discipline keeps the timber sale revenues in their accounts while forestry pays a lot of the bill to get it set responsible sales set up and administered. We sometimes get them to pay for paint but it is piece meal at best. There should be a mechanism to chargeback to the program the cost of sale establishment and administration mileage since they reap the financial rewards at a program level. These charge backs would help us maintain our current level of support while expanding the nursery role of providing an incentive for reforestation.

Division of Forestry staff

673. Agree.

Division of Forestry staff

674. I am not sure if this applies, but reforestation is such a broad term and it doesn't mention any ecological decision making to reforestation (i.e. planting red pine everywhere), this may be too specific for this process.

Division of Forestry staff

675. Agree. Increased funds for reforestation of state owned lands should also include the necessary site preparation, pre-and post-sale work to ensure adequate regeneration of a site. This should include treatment of invasive species. I would suggest setting up and advertising donation accounts for this purpose.

Division of Forestry staff

This is over due.

Division of Forestry staff

676. I also have the concern I raised before, perhaps this time best framed under S-3 - that appropriate landscape context consideration be given to reforestation/afforestation efforts to minimize some potential negative effects of trees in a grassland dominated landscape, where the landscape goal is in fact open grassland.

Also under the umbrella of S-3 - I'd like to give a shout-out to the idea of... a statute change to allow the use of timber sale revenue for reforestation associated with timber sales (although I would expand that subtly to allow for management of that property). So for example, I'd love to see us be able to use the revenues from a timber sale designed to recreate barrens, or savanna, for post harvest treatment to effectively reach the habitat goal associated with the timber sale and not limit the use to reforestation.

DNR staff (non-Forestry)

677. The proposal of increasing reforestation work is good. I think that a fair amount of this work could potentially be bid out and handled by the private sector. The state is not saving any money by allowing the private sector to work on state timber sales. DNR forestry staff have to do lots of extras to prepare for the work to be done, the administration and supervision of the cooperators has to be done, and the work has to be inspected. This all takes a lot of time and effort that we could have been investing in completing the work ourselves.

Division of Forestry staff

678. Changing the statute to allow timber sale revenue to be used for reforestation seems to be the most logical answer. This also shows the importance of being accountable for timber sale revenue generated from a sale.

Division of Forestry staff

679. The nursery team supports S3 (reforestation on state lands) because it supports sustainable forestry.

DNR Forestry Specialist Teams

680. We support the increased level of investment in State Forest reforestation. A stable funding source to meet all reforestation plan needs is important to responsible, sustainable management. A pool of funds can be applied where most needed and long range planning and resource needs can be met. Sustainable forestry management, Master Planning and Certification standards require we address this issue.

Division of Forestry staff

681. I agree with prioritizing reforestation efforts on state lands when identified as part of the master plan.

Division of Forestry staff

682. I think that natural regeneration issues have been overlooked in this proposed change. There are a lot of stands that are inadequately stocked and need site preparation to obtain stocking levels and these stands are just as important as those that need to be replanted. Along with increasing the funds for reforestation some funds should go into researching proper techniques for natural regeneration or other regeneration issues. Such as invasives species like garlic mustard, ironwood, or muscledwood. For example, the Flambeau River State Forest is comprised of primarily northern hardwoods. We have regeneration issues in these stand types that normally regenerate naturally. Our issues come mainly following wind events. We also have issues with ironwood and muscledwood in the understory of these stands competing with hardwood species. These stands are not regenerating to fully stocked stands but do not need to be replanted they just need additional silvicultural treatments which are just as effective and important as reforestation after the last harvest of a red pine plantation.

Division of Forestry staff

683. These funds need to be also used for inadequate regeneration problems on state lands.

Division of Forestry staff

684. Great to see an increased push on reforesting state lands.

Division of Forestry staff

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

DNR staff (non-Forestry)

686. Increased funding is sought for reforestation of state lands; we are curious about what funding sources are being considered, and how priorities will be identified.

DNR staff (non-Forestry)

687. S-3: Why do you want to do this? What type of reforestation? All the state lands I am the lead forester on are either wildlife areas or fish management properties. The current crop lands would be the easiest areas to set up

reforestation, but why would the land managers want this management practice implemented? As a field forester my observations have been a mixture of different land types supports several species of wildlife.

Division of Forestry staff

PUBLIC COMMENTS

688. Agree to continue supporting investments in reforestation on state lands. This should include both planting and natural regeneration methods. Is there a backlog on State lands and why is an increase needed?

M. Luedeke

689. Agree

N. Paulson

690. WWOA is not privy to the need for reforestation on all state lands and therefore has no comment on S-3.

L Hanson, WWOA,

S-4

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)

DNR STAFF COMMENTS

691. I am concerned about promoting recreation activities that may negatively affect the natural resources on state owned properties. Our division is charged with protecting and sustainably managing the natural resources of Wisconsin, not appealing to every interest group that wants to use them.

Division of Forestry staff

692. Agree. I'm glad to see the increased recognition and investment in forest recreation. This important non-timber commodity fills an important societal need and can be a white hat for us.

I also agree with S-4 re: increasing the level of investments in the rec. program on state forests. I don't think the rec. program gets nearly the attention it deserves. Particularly when it comes to the state forest working group.

Division of Forestry staff

693. If new remote camping and trails are to be proposed efforts should be made to locate them in passively managed areas of the Forest when possible. Forest management activities and recreational activities would be less at odds. New hiking or biking trails bisecting large blocks of Forest Production area should be minimized when possible.

Division of Forestry staff

694. Increased level of investment in State Forest recreation program would fill a need for more developed recreation opportunities and should be considered in active and passive management areas. Forest management should be modified but not eliminated in these developed areas. The increase in development should not come at the reduction in forest managed areas. This can be addressed in Master Plan change process.

Division of Forestry staff

695. Recreation is a huge aspect of why state forests lands are utilized and I agree with identifying possible recreational pursuits on state forest lands and implementing steps to more fully utilize those properties when possible. Providing a full range of recreational activities will result in more opportunities for the users.

Division of Forestry staff

696. I think the level of investment in the state forest recreation program should be maintained instead of increased. I think cost effectiveness needs to be addressed in this change. Some of the forests provide free river camping and free remote camping. Maybe these need to have a fee associated just to maintain the level of investment. The DNR should invest in recreation activities cautiously to ensure the activities are being adequately used.

Division of Forestry staff

697. I think its great to invest more in recreation opportunities on forest and even other state lands if possible. As a silent sport recreator I think its great to put more emphasis into remote camping and trail systems. I would certainly use them. But on top of that I would advocate for no fees for the remote area users because typically these folks (myself included) practice and preach the LNT (Leave No Trace) land ethic and they would be light on use anyhow. Most likely a non-fee permit system should be used (such as a lot of the federal multi-use land base and wilderness areas on USFS and BLM lands) to help attract the LNT users. This demographic of users is a great group to reach out to, I will admit that I of course have bias being one of them.

Division of Forestry staff

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

DNR staff (non-Forestry)

699. While I realize we are the odd duck in the Division; my job is important to me, the public I serve and the internal and external partners I work with. Supervisors issued law enforcement credentials have very little time allocated to law enforcement patrol duties. Officers currently report to an individual Forest Superintendent with no or very little law enforcement experience; having non-LE people supervising LE people under our current system has proven to be precarious at best. We currently have no line (stove pipe) supervision structure and each of the superintendents of the Northern State Forests are free to re-direct law enforcement personnel as they see fit with very little oversight or accountability. This creates contradiction among the State Forests in law enforcement priorities and how patrol is conducted, cripples our ability to assist other programs (within Forestry and externals), and puts good officers and employees into roles that do not fit the position or the positions intent. Our Law Enforcement Study supports these statements. It affects training, ability to coordinate group checks, diminishes our ability to consistently assist Fire Control with wildland fire investigations and to assist with timber theft investigations.

It was stated that the team is looking for specific examples of the disconnect The disconnect is that the SFWG in no way represents the views of law enforcement, no fault of their own, but how could they? The SFWG certainly does a good job (I've seen the work), but the assumption that the SFWG is representative of law enforcement is like having the fox watch the hen house. There is almost no law enforcement representation in the group. The disconnect is that Leadership believes that supervisors and working teams are representative of the people on the ground. In regards to the Northern State Forest Law Enforcement Program, that is far from true.

I ... have suggested in numerous meetings that a NSF Officer could be present at pre-sale meetings between the Forester and the Logger to be able to support the Forester, see the sale objectives first-hand, and to provide another resource/contact to the logger; this is a proactive approach to law enforcement. This idea was warmly accepted, however, this has not taken place once to my knowledge. In addition, I've been told that NSF Officers on other NSF properties have been directly told to stay away from timber sales. Without two-way conversations we are left to surmise that this is nothing more than lip service.

Also, a direct cost savings is to not purchase ¾ ton trucks for LE. Not only are they poor enforcement vehicles, the increased mileage rate Fleet charges for these larger vehicles adds up. I do not necessarily advocate that all NSF LE vehicles be switched over (a needs assessment for each property should be done) but if half the NSF LE Fleet was switched to Intermediate Trucks or SUV's, the cost savings per year would be \$15,600 (for six vehicles based on a 20,000 mile annual average per vehicle) per year; it would be a savings of \$109,200 over the lifespan (seven years) of those six vehicles. Granted, not a lot in savings, but a start at creating a separate budget for a stove pipe structure for law enforcement without affecting individual property S-lines.

I fully realize that if you seek more information you will find people in Forestry that disagree with our law enforcement officers roles. However you will also find people from the field to the Bureau level that support this. It is not so much a trade-off as it is better integration and commitment of NSF LE with recreational law enforcement and public safety, Fire Control, and providing assistance with timber theft on and off of state lands while better utilizing our resources.

Additionally:

Reimburse NSF Law Enforcement for mileage and services when assisting on wildfire investigations as the Fire Control folks do for billing private parties.

If additional FTE Law Enforcement positions are added, LTE numbers can be reduced or eliminated which would reduce costs of hiring (time, background investigations, physical, and drug test) and reduce the property L-Line.

Savings are already in place with the fact that we provide internal law enforcement training with our own instructors. In addition moving our annual In-service to Ft. McCoy would save around \$2000 on lodging costs per year. As well as the money that we currently pay the College for their instructors/facility would be saved.

An independent and dedicated Law Enforcement Program can be better positioned to seek grants and better utilize the resources/share with Sheriff's Departments.

This plan can save bits of money here and there, but more importantly it increases our ability to serve cross-program functions; efficiency and effectiveness are hidden measures of costs. As a reference model, the US Forest Service, sighting similar issues, has separated its law enforcement officers from the direct oversight of superintendents. USFS Officers still serve their respective forests; however, they now have a stove pipe structure in place to which a law enforcement officer reports directly to another law enforcement officer at a higher level and so forth. Do to the relatively small amount of staff and support at varying levels; I believe a plan can be implemented so we can better serve the public and partners while protecting the resources and the business investment that goes into managing our timber on state forests. I apologize that this is lacking in details, however I'm sure that this is already long enough. [Comments included suggested organizational diagram, and tables comparisons of NHAL State Forest to national parks and properties].

Division of Forestry staff

700. I don't feel I have enough pieces of the puzzle to comment on this. We need leadership to say what we are and ARE NOT doing and then FOLLOW THROUGH WITH ACCOUNTABILITY....

Division of Forestry staff

701. Law enforcement is very complex and we need a support staff along with administrators who can work with issues pertaining to our ever changing times. Having the ability to have a straight line type of organization for our officers would greatly reduce work loads for all for property managers, team leaders and superintendents. Many changes come within our properties. Field people should have input to these changes.

Division of Forestry staff

702. S-4: Why would you want to do this? Where will the monies come from to implement?

Division of Forestry staff

PUBLIC COMMENTS

703. Agree. State Forests should not become as developed as WDNR's State Parks Program but instead provide a different recreational experience that exposes citizens to large public working forests less intensively developed where sustainable management is ongoing. Citizens need to understand where wood fiber is produced, how forest habitats are maintained, and what practices are employed to assure sustainable forests. State Forests should not compete against private sector recreation facilities with highly developed campground facilities. State Forest campgrounds should not be developed to solely meet the demands of RV campers but offer less developed camping experience.

M. Luedeke

704. Any increase should go first to needed maintenance and improvements to facilities where use is high, not to remote camping.

N. Paulson

705. We agree with S-4 recognizing that state forests provide a huge base for recreation activities.
L Hanson, WWOA,

S-5

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)

DNR STAFF COMMENTS

706. Agree.
Division of Forestry staff

707. Agree. Property boundary management should also include increased signing. Increased property boundary surveys will also lead to additional timber revenue as additional acreage will be available for timber sale establishment in areas that have been avoided due to lack of survey availability.

Division of Forestry staff

708. is very important and I am glad it was included. Issues with boundaries are a tremendous time sink for staff that is nominally equipped to handle them.

Division of Forestry staff

709. This is a must. As landowner's we must be responsible for property boundaries. We promote this to private landowners and we must practice what we preach. With more management activities in the future well defined property boundaries are a must.

Division of Forestry staff

710. In the not too recent past there was a survey crew dedicated to protecting the boundaries of the State Forests. These positions have been eliminated but the need has not gone away. The numerous trespasses and border issues are in need of attention. FTE's devoted to this effort throughout the State would be in order be it at the professional or technical level.

One thing not mentioned in the Strategic Direction anywhere is timber sale security. We take in a significant amount of money in timber sale receipts every year with minimal effort from a wood security standpoint. The focus and direction for forestry staff is backlog reduction and recon update. The focus and direction for LE staff is campgrounds and recreation. Our contractors know this. We hear rumors and occasionally stumble across a bad actor but how much is really happening is poorly understood.

Division of Forestry staff

711. We support the increase in land survey workload investment. The need for property line work grows as private development pressures rise and land management access and utility access become more complicated. Survey work must be accurate and legally justified to adjacent property owners. The State needs to have control of its boundaries and mark them as good stewards of the land we own.

We support acquisition efforts where willing sellers offer strategic parcels within blocks of State Forests. The funding source is in place and we hope it remains at some reduced level. There is a good decision process in place to prioritize these opportunities when they come up. The State is then responsible for managing these with Master Plans appropriate to their designation.

Division of Forestry staff

712. It is extremely important to secure property boundaries. A lot of extra time is needed when timber sales are established next to private property. In some areas of the state, there is very little information on survey markers. In these cases, establishing a "cutting line" is a significant time "sink". Many times the stands located next to private property do not get managed in a timely manner because these areas are avoided due to the amount of time needed to establish the blue "cutting line".

I realize acquisition is important for the future, but the state is unable to manage the land they have. If the state acquires more land, then more FTE foresters need to be hired.

Division of Forestry staff

713. Great idea, I think investing in land survey is very important we have many forest management issues due to property line problems.

Division of Forestry staff

714. Great to see an increased investment with land survey for property boundary issues. Caution here with regards to greatly altering a non-surveyed property line once the surveyed line is put in, because of the bad PR the DNR gets when a line changes and the adjacent landowner loses a small chunk of land to the state. I've dealt with one case of this and the landowner in question now is another DNR hater because of this.

Division of Forestry staff

715. Hoping that this means bringing back a state survey crew, they could be kept very busy and get a lot of needed work done.

Division of Forestry staff

716. S-5: AGREE! I'm not sure where the money will come from, but this is NEEDED NOW!

Division of Forestry staff

PUBLIC COMMENTS

717. The state of Wisconsin owns too much land already. Ditto other federal, state, county governments. Stop taking land off the tax rolls. Any purchases should be for truly rare or endangered resources or to purchase problem in-holdings, or to create more regular land borders.

A. Ode, Bayfield, WI

718. Agree with investment in land surveys to proactively defend against encroachment and trespass by adjoining landowners. The Department's Land Acquisition Strategy should give greater emphasis to conservation easements versus fee title acquisition.

M. Luedeke

719. This is a strange combination of items, land survey and land acquisition. I recommend that they be separate items. I agree with more survey dollars for well thought out needs.

N. Paulson

720. WWOA is not familiar enough with S-5 to comment except we know trespass and timber theft issue are important to private landowners as well.

L Hanson, WWOA,

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)

DNR STAFF COMMENTS

721. We need help on other state lands too.

Division of Forestry staff

722. I agree that a shift can be made to other state lands, but am concerned that with this change, planning in the non-master planning sense may cease. Invasives are a moving target which need frequent planning. Is it possible to emphasize this in lieu of the change?

Division of Forestry staff

723. Agree. As I understand this proposal, the shift in planning will occur as state forest plans are completed freeing up time to focus attention on planning for other state lands. I would agree with this as long as state forest needs are met first. Additionally, I would like to see other non-traditional avenues pursued for use of our state forest planners. This might include assistance with developing Community Wildfire Protection Plans, WUI and fire prevention plans, urban forest planning, etc.

Division of Forestry staff

724. Division Planning should concentrate on lands with outdated Plans or no Plans. State Forest and Lands properties are current with planning and are not in need of extra support staff. This is an area where reductions can be shifted to State Forest timber sale support or backlog harvest planning support.

Division of Forestry staff

725. Master planning on other state lands is important and although overall planning time may be reduced from a statewide standpoint there will be significant increases in planning time for personal in some areas with a significant number of state properties as master plans are updated or developed.

Division of Forestry staff

726. Great to see a focus shift in management to what I refer to as the state's 'forgotten' properties.

Division of Forestry staff

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

DNR staff (non-Forestry)

728. We of course welcome and appreciate the proposed shift in planning efforts from state forest lands, now largely completed, to other state lands. We would like to discuss this further. What types of planning assistance is Forestry considering?

Generally, we wonder how sustainable biomass harvest on state lands will be addressed. Theme C of your Forest Strategy presents a very good summary of the issues to be considered with woody biomass production. What is to be the specific role of our state lands, however?

DNR staff (non-Forestry)

729. S-6: This seems to be a proposal of what is currently in place.

Division of Forestry staff

PUBLIC COMMENTS

730. Agree with reducing investment in State Forest Master Plan updating at least for the next 10 years. Once all State Forest plans are finished, there should be an effort to prepare a “lessons learned” summary of the master planning process and develop a master “boiler plate” outline that can be used for the next round of MP similar to what is prepared for maintaining consistency for all 29 County Forest 15 year Comprehensive Forest Plans. Current State Forest Master Plans do not have the same format and this should be corrected before the next rotation of master plans is started on State Forests.

I don't agree with shifting significant DNR resources to work on other state lands master plans. Other programs have dragged their feet and should internally step up to streamline their master planning process. This appears to be a shifting of the expense of master planning for other WDNR programs even heavier onto the DNR and ultimately, the limited Forestry budget allocation. Other programs should seek to contract their master planning process to the private sector to achieve better efficiencies in plan preparation and not transfer the expense or demand for staff assistance to the DNR.

M. Luedeke

731. This statement is not clear to me. Are you actually proposing to reduce the investments in Planning or are you instead shifting the money to other needed planning efforts on other State lands?

N. Paulson

732. We concur with S-6 as long as the state forest master plan is kept current.

L Hanson, WWOA,

URBAN FORESTS (UF)

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.

DNR STAFF COMMENTS

733. It's my understanding that the DNR UF Working Group is submitting a compilation of comments from our January 18 discussion about the strategic direction for urban forestry. But I also wish to offer my own comments about the urban forestry section. My response is based on the understanding that this plan is meant to chart direction for the near-term future (i.e., a 5-year plan).

1) I believe the proposed UF direction is unrealistic for the 5-year planning horizon. It is based on highly idealized, overly simplistic assumptions about real-world circumstances. Ability to implement, particularly proposed changes UF-1, 2 & 3, is poor in much of Wisconsin at this time.

2) I further believe this document defines the Division's role in exceedingly narrow terms, particularly the 1st sentence in the role description. Building/convening UF partnerships has limited applicability to much of Wisconsin at this time. Where feasible, partnership building/convening can be an excellent method of accomplishing what I believe is the Division's larger and more appropriate role: BUILDING URBAN FOREST MANAGEMENT CAPACITY. Building UF management capacity in Wisconsin's municipalities is a long-term investment that our agency is uniquely suited to make and it is aligned with our mission of forest resource sustainability.

3) Comments 1 & 2 are based on what I understand the strategic direction for urban forests says. Program manager Dick Rideout has provided his explanation/interpretation of what the urban forestry section means (see attached). It is of great concern that there is considerable discrepancy between the two.

Division of Forestry staff

734. Add tribal governments.

What is really meant by "convener"? Needs clarification

Needs to incorporate "building capacity" and our role related to natural resources.

What does "integrated community canopy" mean? Document needs to more clearly state this is inclusive of public *and* private trees.

What is the "street tree model"? Document needs to more clearly state this refers only to public trees.

"Shift emphasis" suggests moving from a regional focus to a central office focus – is that the intent?

DNR Forestry Specialist Teams

Perspectives:

We are passionate about our work and the customers we serve.

We have a great program and we are very innovative.

Increasing partnerships is an intriguing concept.

The secrecy used in the bucket team process stimulated mistrust and created bad feelings and worked against team building.

Developing partnerships is a huge time investment and may be more time consuming than dealing with a small community.

Many of our new TCUSAs come from small communities.

This doesn't address our historic relationships.

Our "DNR face" and "go to" connection to the communities, regardless of size, will be lost.

“Uniting communities” isn’t happening now (even when they share the same street); why do we think this will occur in the future.

I need to get my foot in the door first to build capacity long term – we are the ones to do this.

Focus should be on where we can get the biggest bang for our buck (ie. larger projects); are we focusing too much on personal preferences.

Will the new direction stifle the innovative things we currently do?

Small communities are distributed across the state; metro areas are not.

When we meet with the city forester, regardless of community size, it’s like meeting with a trainer and a broader leadership outreach as this person networks with multiple contacts within the municipality (triangle concept).

In the real world, opportunities may not exist to develop partnerships.

Not increasing funding to the grant program goes against our current grant revamp process.

Maybe all employees don’t have to have “ownership” in the final product, rather recognize it’s OK to simply accept this as the new direction that management deems is best for the division based on current realities.

DNR Forestry Specialist Teams

735. In these times, I don't understand the purpose of this program. It should be well scaled back until better times. The only purpose I see is as a promotion or advertisement to the 80% of the folks that hold our fate in their hands. If this is the case, then better promotion of what we give them should be in order. No one will argue the benefits of urban trees (hard to call them forests), but I don't think this is our niche.

Division of Forestry staff

736. Agree with concepts.

Division of Forestry staff

737. Agree with our role and all proposals.

Division of Forestry staff

738. UFWG would like to have a role in developing the urban forestry resource allocations within FLT parameters and deadlines.

DNR Forestry Specialist Teams

739. I don't agree with increasing the investment in the urban forestry program. Our dollars should be focused on the larger, rural landscape. We should maintain, or decrease if possible, our investment by developing partnerships and providing seed money for urban projects. Once partnerships are established, I feel we should scale back time and money and reallocate dollars into county forests as noted above. We should provide seed money for urban projects to get projects going and then back out and let the local communities run with the projects.

Division of Forestry staff

740. Comment is edited text of SD document...

The Division’s role in urban forestry is to support urban forest management capacity. This includes convening and building partnerships, and community organizations. The Division is proposing to shift emphasis from a public ‘street tree’ model to an integrated ‘community canopy’ model to maximize the public benefits from all trees and forests in our communities.

The community canopy model features the entire urban forest, both publicly and privately held, and relies on geospatial inventories and assessments. Where possible direct assistance to communities will be deemphasized in favor of engaging partners, such as non-profit organizations, private arborists, and consultants, to provide service to individual communities. Where possible, one-on-one assistance to individual communities will be deemphasized in favor of delivery methods that benefit multiple communities. These economy-of-scale approaches expand and leverage existing capacity, improve efficiency and broaden support.

Division of Forestry staff

741. Since the start of my forestry career, I have long been an advocate for urban forestry issues, therefore, I agree with a 1% increase in resources allocated here. Since 80% of Wisconsin's population resides in urban areas, this in a wise decision for a large block of folks that pay our forestry mill tax.

Division of Forestry staff

742. Just before the release of the draft strategic direction, as leader of the urban forestry bucket team I was given the opportunity to revise the wording of the urban forestry section. I made some minor alterations and thought it was fine. However, over the past few weeks, I've had a lot of interaction with staff, advisors and clientele on the proposed strategic direction for urban forestry that revealed I was too close to the product to understand how others would view it. Here are some observations and suggestions on improvement.

Almost uniformly, much of the terminology as well as the intent of the recommendations were misunderstood or misinterpreted, even after I provided some examples of what the strategy might translate to in the real world (for the many concrete thinkers out there). While correcting the word choices could address some of this ("metropolitan scale" and "convener" being the most egregious offenders), I think there are three fundamental omissions that are really the source of much of the confusion.

First, there is no acknowledgement of the past successes of the current model, what has changed in the last 20 years, and how those changes have brought us to the point of needing to change our strategy - in essence, the "Why" of the proposed changes. This should be spelled out in the Challenges and Opportunities section. It could be done quite succinctly and I would be happy to draft language for your approval. Without setting this stage, I hear most saying that what we're doing now is great and few are making the connection to the need for the new scale of the niche being proposed.

Second, our urban forests' lack of diversity and canopy cover are only the challenges for the resource itself. The challenges for the practice of urban forestry, which we are responsible for, are the lack of technical expertise, the capacity to manage the resource and the public and private support to do so. These challenges must be included in the Challenges and Opportunities or again the proposed changes don't make sense.

Third, the objective or desired outcome for each proposed change is missing. This puts the recommendations in a vacuum and has led people to perceive that a specific change in what our staff would do means a reduction in service to customers or that the service is not important. This is true for all 5 UF changes, but the most blatant example of misunderstanding is UF-1. It reads "The Division will focus assistance at the regional or metropolitan scale and will do less individualized local program delivery." The objective of this change is actually to increase service to local programs. The proposed change is to alter our role from providing individual service to developing other capacity to provide more service than 6 DNR staffers can. Everybody is acutely aware that individual service is needed to affect local urban forestry programs, so they believe that our change is counterintuitive unless we include the objective of the change. UF-5 also suffers from this lack of objective. The objective is actually to increase general public outreach and education, but UF staff will do less of it and instead focus on targeted audience, while division staff or partners will do more general outreach.

I have one additional critical suggestion on content and one observation on misleading language.

Content: Division of Forestry's Role in UF – DNR's role is not only as a convener (change the word), but it is also to set (or adopt) unbiased statewide technical standards of practice and resource management goals and objectives. This is something that DNR is uniquely positioned to do.

Misleading language: The proposed changes use language that is unclear or ambiguous. What exactly do "focus assistance" "increase the focus" "maintain the ... program at current levels" "increase investment" and "decrease investment" mean? Are we talking money, time, staff or some of each? Perhaps definitions are in order?

Division of Forestry staff

743. I agree with this proposal.

Division of Forestry staff

These comments and suggestions are focused on the urban forestry section only. First some context for my comments, since the release of the draft strategic direction I have had a chance to discuss the role and intent statements with central office staff, the division's urban forestry working group, and the Wisconsin Urban Forestry Council. The consistent feedback that I heard is appreciation for the FLT's difficult task of focusing the intent of the division in such a short

document. More importantly, the urban forestry strategic direction role and intent statements are universally misinterpreted and not well understood.

Dick Rideout developed a companion document to explain the draft strategic direction and offer examples to give meaning to the document. With additional explanation, the concepts in the SD have support, but much concern remains that, as written, the SD is open to misinterpretation and may hinder progress rather than presenting a clear path for DNR actions to advance urban forestry.

So what are the concepts that have support? This is my distillation of concepts that I have heard. The DNR role is:

To build the capacity for urban forestry for all communities.

To remove or advocate for the removal of barriers to enable communities to work together as neighbors or in regional partnerships.

To provide for a periodic inventory of the statewide urban forest resource.

To facilitate, foster, and develop partnerships between business, non-profits, government, and the university to advance urban forestry.

To continue to offer grants and incentives to help communities plan and implement urban forest management while leveraging local resources.

To be an unbiased technical expert and advocate.

To provide education and outreach to targeted audiences.

In addition to the concepts related to the DNR role, other overarching concepts that have support include:

The focus on the entire urban forest canopy instead of just the publicly owned or controlled portion (e.g. street trees, parks and conservancy areas)

A regional service delivery model.

Increasing the level of state investment in urban forestry.

What is missing from the strategic direction draft is recognition of the tremendous progress that has been made due to the efforts of many to build a state urban forestry over the last 25+ years. Many of the concepts in the intent statements are not so much new directions but rather expanding on current efforts.

The role statement – while I recognize and support the concepts in the current role statement, it is being misinterpreted as currently written. Readers of the role have issues with the word “convener” (assumes a power position) better words are facilitator or connector. The “public street tree model” is read as too simplistic, not recognizing that municipalities already manage much more than street trees; better to contrast a public tree canopy with an integrated public and privately owned canopy. There is also room to expand the concepts in the role statement and it could look like this:

“The Division’s role in urban forestry is that of a facilitator to bring interests together, build partnerships between communities, private sector specialists and community organizations to build the capacity for urban forestry for all communities. The Division will also continue to provide unbiased technical expertise, advocacy, targeted education and outreach, grant funding and basic inventory information to enable a shift in emphasis from the publicly owned urban forest to an integrated public and privately owned ‘community canopy’ model.”

...

I think that this intent statement needs to be reworked. The “metropolitan scale” is misinterpreted as only big cities, i.e. Milwaukee, leaving smaller communities out of luck. An assumption is that size equates to resources and the will to act, in other words medium and larger communities will have the resources and will to act and that’s where we can do the most good. I’ve seen two examples recently where this is not so. Lacrosse a larger city is proposing to eliminate their city forester position that has been in place for over 32 years as a cost cutting measure even though EAB is only 15 miles away. Hudson doesn’t have a city forester, yet they had a municipal official graduate from our Community Tree Management Institute last year and now Hudson will be a new Tree City and has residents donating money for tree planting and a vibrant program in its infancy. We need to work at both scales.

Division of Forestry staff

744. Please see P. Murphy’s summary of the UFWG meeting. I agree with what was captured from our meeting.

The fact that Dick Rideout needed to write a 2-page explanation for the 3-page Urban Forestry section demonstrates that it needs to be reworded; otherwise it will be widely misinterpreted.

The different regions need to be given flexibility in how to best implement the strategic direction in their specific regions of the state. Implementation details are crucial in getting support for this document. In understand it's a 'strategic' plan, but how is one supposed to take ownership when we don't know how this will ultimately affect our region's communities?

I disagree that these partners are "well suited" to provide services to individual communities.

Division of Forestry staff

745. I do not have a good sense of this program—I don't know what our "PRODUCTS" are here.---so without gaining more knowledge hard to comment—makes it easier to say reduce this effort.

Division of Forestry staff

746. "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." Even though 2/3 of WI communities still lack an inventory? This seems premature.

"Direct assistance to small communities and nonparticipating communities will be reduced in favor of developing partners, such as non-profit organizations, private arborists, and consultants, which are well suited to provide service to individual communities." In my experience, the last part of this statement is not true.

Division of Forestry staff

747. Urban Forestry is outside my expertise but pulling away from outreach, education and direct program delivery particularly to smaller communities, seems a step backwards. I think we will have a hard time pulling together partnerships effective to handle this for economies of scale reasons.

Division of Forestry staff

748. The BWM agrees with the importance and overall direction in Urban Forests. Taking a community approach makes a lot of sense and we'd encourage future collaboration with the Bird City Wisconsin program as a way to realize the mutual benefits of a vibrant urban forest.

DNR staff (non-Forestry)

PUBLIC COMMENTS

749. After reviewing all five statements, UF-1-5, I agree that all are appropriate for better understanding and managing the urban forest canopy.

B. Brush, UWSP

750. Proposals look good.

P. Dayton, Vernon Co.

751. I took serious exception to the notion that smaller communities do not follow thru on the initial funding and their forests do not provide enough benefits to warrant financial support. I find this to be wrong nearly all of the time. I am amazed at the number of communities that do follow thru with recommendations. Are they likely to hire a forester with a full time arborist staff as larger metro areas do? No, but they often achieve exceptional results thru the use of existing staff, tree boards and volunteers. They are the masters of partnership in this regard. Small communities throughout the state are more than whistle-stops, they are small but important pockets of the urban forest. Why is an individual less deserving of a healthy urban forest simply because they aren't located in a metro region?

It is concerning that the regional urban foresters were similarly confused about the 'metro' change. If the regional DNR urban foresters who are intimately familiar with the DNR and UF are unable to understand the proposed change, how will traditional foresters or lay people who will be instrumental in implementation understand? K. Tuttle, Urban Forestry Council chair,

752. Agree with role and proposed changes.

G. Rebman, USDA-NRCS

753. I was pleased to see recommendations for: Maintaining the urban forestry grant program.

J. Solin, UWSP

754. The WAA held its Annual Conference this past week where at our business meeting our membership voted to respond in favor of the proposed Division of Forestry Strategic Direction draft. However, there are a few areas of concern we would like to point out.

In general the members of the WAA have been happy with the direction and guidance the DNR Urban Forestry program has given over the past 20 years. Countless municipalities, non-profits and private entities have benefited from the technical assistance given by DNR staff and the funds provided through Urban Forestry Grants to create and develop urban forestry programs across the State of Wisconsin. The WAA feels this is a vital and necessary role for the DNR Urban Forestry program to continue.

The shift of emphasis from a 'street tree' to a 'community canopy' model is the right direction for the future, as long as the 'street tree' does not get lost in the 'forest'. This concern has been reflected by other groups as well. Language such as, 'metropolitan areas' is ambiguous and needs refinement. This language leads one to think that the small communities of the urban rural interface may be left behind in favor of the 'big city' programs. This needs to be addressed in more specific terms.

In closing I would like to reiterate the endorsement of the WAA on this proposed Strategic Direction for the Division of Forestry specific to the Urban Forestry program. The challenges that face the members of our organization and the State of Wisconsin need to be addressed at the regional level which will involve multiple groups working together to achieve the common goal of protecting and promoting our urban forest.

B. Pelot, Wisconsin Arborist Association

755. The council's primary concern was with the vocabulary. The wording was difficult to understand and largely misinterpreted. Wording such as 'metropolitan' and 'convenor' need to be clearly defined or replaced with more easily understood terms. Any strategy that needs interpretation or translation to be properly understood will not be successful or effective.

A large portion of our recent discussion revolved around the suggested shift from local, individualized program delivery to assistance at the regional or metropolitan scale. Our membership also received numerous contacts from urban forestry stakeholders echoing a similar concern. The existing individualized program is very successful. The current delivery system has reached many communities and individuals in its 20 year existence. The Division cannot do everything for every community, but for large segments of the state, regional coordinators function well as technical advisors on an individual level. This is a valuable resource that needs to be encouraged and maintained.

K. Tuttle, Wisconsin Urban Forestry Council,

UF-1

<p>Proposed Change: The Division will focus assistance at the regional or metropolitan scale and will do less individualized local program delivery. (UF-1)</p>
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DNR STAFF COMMENTS

756. I feel this change would mean a large geographic segment of the state would not receive much emphasis, but some of the non program communities within metro areas will potentially receive opportunities they had not, before. My concern and question is how will these regional or metro scale areas be brought together, I don't feel the UF Coordinators currently have the expertise to do this and why would this occur as there would need to be something worthwhile for the non-profits, consultants or private arborists to forge such a venture such as profits or more work.

I also feel that the terms regional or metropolitan scale need to be defined so that we know what is priority and what is not.

Division of Forestry staff

757. Needs more flexible wording for “away from smaller communities to larger”.

There is a disconnect between what the lead in narrative states and the proposed changed – two different meanings, perceived by some as a power grab. Need to explain that our *role* in assisting small communities needs to be different in the future, not that they will not receive support or that they are unimportant. Change to “areas lacking tree canopy”. Define “metropolitan” and “small community”. Who will define which communities met which description?

DNR Forestry Specialist Teams

758. Smaller communities should take responsibility for their own street trees. Not working with such individual programs is another (analogous to CO-1) obvious cost savings for the Division of Forestry.

Division of Forestry staff

759. Disagree; this practice eliminates direct contact with the final customer. I think the concept of building capacity is great but we need to stay apart of the building process from beginning to end. UF-1 seems to be the exact opposite approach of the private forestry strategy in terms of reaching the uninitiated.

Division of Forestry staff

760. Overall comment is that resources should be targeted to those areas of the state that demonstrate the greatest return in accomplishing the DOF mission. Program should focus on the macro and not on implementation of the micro. Program should maintain integration and coordinated management effort where appropriate with FH. Question and discussion on the reference to the specific assessment and strategic plan for role in education and outreach. (UF-1 – UF-4) Will be expanded on in (CP-4)

761. Division of Forestry staff

762. A disconnect exists between what the document actually “says” (black & white) vs. what it “means”. People are interpreting the same words differently; are we to respond to the draft strategic plan or to Dick’s follow-up explanatory letter.

Division of Forestry staff

763. What is really meant by “convener”? Needs clarification

Division of Forestry staff

764. Needs to incorporate “building capacity” and our role related to natural resources.

Division of Forestry staff

765. What does “integrated community canopy” mean? Document needs to more clearly state this is inclusive of public and private trees.

Division of Forestry staff

766. What is the “street tree model”? Documents needs to more clearly state this refers only to public trees.

Division of Forestry staff

767. “Shift emphasis” suggests moving from a regional focus to a central office focus – is that the intent?

Division of Forestry staff

768. Really need to show or define what is meant by regional or metropolitan scale areas. The DNR Urban foresters are uneasy about this from not knowing what parts of their regions are included or not included in this scale.

Division of Forestry staff

769. Disagree. Our current urban forestry model has been an excellent success and highly regarded. The proposed shift towards large metropolitan areas and less on smaller communities would be a great loss to those communities that

are least positioned to take on urban forestry by themselves. Regional scale program delivery is fine in highly urbanized areas of southern and eastern WI but what about the many small cities and villages scattered throughout the northern part of the state? There needs to be a way to maintain at least a basic level of assistance to those communities that people drive through and recreate in.

Division of Forestry staff

770. Edited SD text... Where possible, the Division will focus assistance at the multi-community scale, will collaborate with partners and will do less individualized local program delivery.

Division of Forestry staff

771. This proposal wants to shift DNR resources to those who are already best able to take care of themselves and shortchanges those who have the least resources to achieve the 'community canopy' goals.

Division of Forestry staff

772. I love the community canopy model approach to urban forestry - again, visionary!!!

DNR staff (non-Forestry)

773. DOF assistance on a broad scale is wise while letting our partners focus on the local program. We do not have adequate resources to provide a lot of custom local service. We should encourage and help leverage our partners ability to provide this local service.

I applaud our continued support of the fine programs of the National Arbor Foundation and other partners especially the Tree USA and Tree Line Programs.

Division of Forestry staff

774. UF-1 could read, "Proposed Change: The Division will focus technical assistance at the multiple community or regional scale and work to build the capacity of partners to provide individualized local program delivery.

Division of Forestry staff

775. "...do less individualized local program delivery." This is in direct conflict with our current secretary's focus on customer service. This is essential for some communities. Regional coordinator needs to decide how to best implement for their region.

Division of Forestry staff

776. "The Division will focus assistance at the regional or metropolitan scale and will do less individualized local program delivery." (need a definition for the word less)

Division of Forestry staff

777. I think it is a good idea to increase focus in the areas outlined here. I have no experience or much knowledge about these programs, but it seems that at least with the creation of an inventory system there is a new workload. Will this fall on the current urban forestry FTE staff, and/or will there be a push to hire more either FTE/LTE staff to assist in this goal?

Division of Forestry staff

778. UF -1: Disagree. This proposal seems as though it could be unfair to smaller communities.

Division of Forestry staff

PUBLIC COMMENTS

779. There may or may not be the grain of a good idea here, but extreme care must be taken in passing responsibilities for the urban forest off to NGOs and nonprofits. First, they are not directly responsible to the taxpayers and yet will obviously need a lot of taxpayer dollars through grants. Remember the trouble that "taxation without representation" can cause? They may be no more effective or economic than state programs and employees, since in order to accomplish much they too will have to hire professional employees. I am very concerned about small

communities being left to their own devices and large cities and metro regions getting all the money because that is where the most votes are. This whole idea is rife with potential for political influence and concomitant vote buying by politicians. At the time of the “stimulus” grants two years ago Milwaukee entities were given the guidelines and had their proposals in months before the rest of us even heard of the program. Consider also that if the DNR no longer provides the service, they will no longer get the credit, and the DNR needs all the good publicity and public relations it can get.

Also, I am very uncomfortable with the idea of a “community canopy” concept taking precedent over traditional street and park tree programs. In our culture the individual homeowner or landowner bears responsibility for the management and improvement of their private property. Most do an excellent job of that and take great pride in it. Educating the landowner is one thing; creating rules, regulations, and enforcing esthetics and other intrusions on the liberty of the citizen is quite another. I have heard too many sophomoric discussions about controlling private property for issues from planting native species to “global warming.” To go there is agency suicide! (UF 1,2,3,5)

A. Ode, Bayfield, WI

780. Strongly agree to reduce urban forestry focus at the local, county level and instead limit involvement at the state or regional level. The DNR should be consistent in encouraging development of private sector urban forestry consultants to handle this need for professional services just as was emphasized over the past ten years for Wisconsin’s private forestry program.

M. Luedeke

781. As with our discussions last week, my primary concern is with the shift in emphasis from individual community assistance to a ‘metropolitan’ emphasis. Clearly, I have a vested interest in grant funding for smaller communities, but believe many others do also.

...

Mention was made of direct local assistance. It appears that the same local assistance will be provided, merely for larger communities. Same assistance, different community. Some may argue that metro areas that currently staff foresters and arborists are in less need of assistance. The phrases such as “assistance will be focused on communities that have existing capacity to leverage state investments” are confusing to me. Is the DNR looking to assist communities that already have the access to or the ability to leverage funds?

...

It is important to recognize that one size does not fit all. Individualized, local delivery is essential to certain segments of communities throughout the state. Others will be more effectively served thru multi-community service. A combination of both services and program delivery is essential to meet the needs of varied communities and their varied resources.

K. Tuttle, Urban Forestry Council chair,

782. WWOA understands the value of our urban forests and concur with UF-1 as long as that shift in emphasis supports UF-5.

L Hanson, WWOA,

UF-2

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)

DNR STAFF COMMENTS

783. I feel this is a plausible idea, but how does the division expect the current cadre of UF Coordinators to develop these broad scale partnerships when they are not well versed in this role?

Division of Forestry staff

784. Broad partnerships were generally central office contacts in the past, when is it now a regional role? (Answer: everyone will do appropriate to their position scale.)

Training will be needed in partnership development, being a convener and other new roles – we don't know how to do these tasks; should each UFC have an assigned area of expertise.

What's the UFC's role in developing funding mechanism?

It's more than just raising money, it's moving to public/private cooperatives and involves compromise

DNR Forestry Specialist Teams

785. What does "funding mechanism" mean?

There is a disjoint in the wording between "developing partnerships" and developing "funding mechanisms".

DNR Forestry Specialist Teams

786. This is very needed. Some individual communities need encouragement and incentives to engage in, or set priorities for, urban forestry.

Division of Forestry staff

787. There is a disjoint in the wording between "developing partnerships" and developing "funding mechanisms".

Broad partnerships were generally central office contacts in the past, when is it now a regional role? (Answer: everyone will do appropriate to their position scale.)

Training will be needed in partnership development, being a convener and other new roles – we don't know how to do these tasks; should each UFC have an assigned area of expertise.

What's the UFC's role in developing funding mechanism?

It's more than just raising money, it's moving to public/private cooperatives and involves compromise

Division of Forestry staff

788. Agree. This has already been proven to be a success and should increase.

Division of Forestry staff

789. I support this intent statement as written.

Division of Forestry staff

790. DNR doesn't develop funding mechanisms. This can be directly through partnerships. "...larger grants" ...An increase in funding is needed first.

Division of Forestry staff

791. UF-2: Agree, but is this being done now?

Division of Forestry staff

PUBLIC COMMENTS

792. Agree to encourage all municipalities to take on more of the urban forestry needs using local resources and investments.

M. Luedeke

793. All of that said I do feel very strongly that DNR UF needs to step forward and expand its mission. The grant funding program is a successful, well utilized program. However, it is time to look at a broader picture. Much talk is made of 'partnerships.' The Oshkosh project is a wonderful example of what can be achieved thru the use of partnership and energy. The idea that the DNR will facilitate these types of projects is outstanding. The final proposed change statement reading "...The Division will focus on partnerships that can provide services to local governments and organizations

working in small communities and those without active UF management” is excellent. This is exactly the type of activity that CTMI & Oshkosh represent. I feel that partnerships, whether between communities as a means to leverage funds/services or partnerships fostered by the DNR are the future of UF. But, don’t throw the baby out with the bathwater. Is there any reason we can’t maintain the current grant program (perhaps at marginally decreased levels) AND support partnerships? I think that our UF community has a strong voice and history has shown they are not afraid to use it when good ideas are on the table.

K. Tuttle, Urban Forestry Council chair,

794. I applaud the focus on creating new partnerships.

K. Ottman, First Choice Tree Care, Junction City, WI

UF-3

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)

DNR STAFF COMMENTS

795. The grant program should have an increase of dollars as it has been in large demand for sometime and increases have not occurred. The term metro scale partnerships needs to be defined so the program knows these areas throughout the state. If these partnerships are going to be the norm the program needs to keep the documentation process simple and easy for multiple partners to participate in. I feel there should be a dedicated amount of dollars still available for the Start Up grants program as I think this may help to get smaller communities to partner and maybe requiring the start ups to partner on their second grant they receive may be a good idea.

Division of Forestry staff

796. Team’s assumption is that the Division’s increased dollars (state money) to the UF program will not be directed to increasing funding for the grant program.

Need to add “where appropriate”.

Need to delete “primarily”.

Rephrase narrative to “to enable individual communities, multiple communities and metropolitan scale partnerships to leverage local resources”.

Emphasize that a direction which encourages “economy of scale” is a benefit.

Throughout the urban forestry section editing is needed to remove the “small community vs. metro areas” connotations.

DNR Forestry Specialist Teams

797. Team’s assumption is that the Division’s increased dollars (state money) to the UF program will not be directed to increasing funding for the grant program.

Emphasize that a direction which encourages “economy of scale” is a benefit.

Throughout the urban forestry section editing is needed to remove the “small community vs. metro areas” connotations.

Division of Forestry staff

798. Agree. However, grants should be maintained for smaller communities as well.

Division of Forestry staff

799. Since “metropolitan scale partnerships” is not well understood, I recommend rewriting this intent statement. “Proposed change: The Division will maintain the urban forestry grant program at current levels to enable communities and partnerships at a regional scale, to leverage local resources.

Division of Forestry staff

800. I disagree with the proposed change.

Division of Forestry staff

801. "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." The second half of this statement contains a proposed change, it is not program maintenance, and I don't agree with it.

Division of Forestry staff

802. UF-3: Agree, but what about the smaller communities.

Division of Forestry staff

PUBLIC COMMENTS

803. No net increase in urban forestry grant program.

This program previously supported investments in urban forest inventory work and should be used to fund any new initiative for urban forest inventory. Don't support use of new funding from other non-urban forestry program areas for this purpose. Use what already exists within the Urban Forestry Grant program.

M. Luedeke

804. Two years ago we asked these small communities to write testimonials and contact legislators to save UF grant funding. They did so in stellar fashion and I feel they were instrumental in saving this grant funding. Are the strategies now recommending that these same communities receive no funding because they are not 'metro?' It feels as if these communities are being kicked to the curb which is not pleasant, particularly in light of the overwhelming support they provided during the last budget cycle.

By supporting the UF grant program, these communities were voicing a strong positive opinion regarding DNR UF in general. It appears to me that a significant portion of DNR regional UF staff time is spent on grant projects (administering, coordinating, etc). I fear that without these grants, two things may happen. First, it will be harder to justify staffing an UF section when their (perceived) largest task is no longer. Second, is there enough support from metro regions to cause future funding and/or program support to be maintained? Many legislators from throughout the state were contacted during the grant funding crisis resulting in a positive outcome. If only metro regions will benefit from the grant funds, these many 'smaller' voices will likely have no interest in the UF program and will be less likely to support it again, leading to a smaller UF budget or staffing decreases.

K. Tuttle, Urban Forestry Council chair,

805. WWOA has some concern with UF-3 primarily because the larger communities benefit as a result of their forestry programs and ability to apply for grants.

We believe UF-3 will penalize small communities which don't have professional staff assistance.

L Hanson, WWOA,

806. The council has long supported partnership development as witnessed by the 2007 & 2009 Urban Forestry Council reports. We feel that this is a critical activity and is significant enough to warrant specialized staff. A unique individual who has the skills and experience in building partnerships and fundraising would be well suited to implement partnership development.

Current mechanisms of delivery within the Division favor individual implementation. Additional mechanisms need to be built to foster partnership building. For successful partnership building and growth, delivery mechanisms need to be in place. The ideal partnership specialist would have knowledge of this critical step.

K. Tuttle, Wisconsin Urban Forestry Council,

807. The Past Presidents committee supports the direction for Urban Forestry as presented. The committee believes the WAA is uniquely situated to partner with the DNR Urban Forestry program, to facilitate and amplify the program's reach into our communities. Our organization, a 750 plus, member-strong organization has the skills and resources available to provide that partnership.

Additionally, we believe the leaders of our organization are positioned to provide leadership, guidance and support as the DNR maps out the strategic goals, actions and measures that will carry this direction forward.

The DNR Urban Forestry program has had a "tree-mendous" impact on the quality of our urban forests in Wisconsin. The WAA is your partner in change as the Urban Forestry program moves forward to reap the positive outcomes - ecological, economic and social - for our citizens and their communities.

Marcia Wensing, Wisconsin Arborist Association

UF-4

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)

DNR STAFF COMMENTS

808. This proposed change seems appropriate, but how is this information to be gained (through a statewide contract) and then used to positively affect the resource? How will the communities or will the communities use this data, do or will they know how to interpret it and who is to assist them with this?

Division of Forestry staff

809. We support the need for the inventory and assessment, but what's the intent?
"Capacity" needs to be better integrated – what's our role.

There are costs associated with the assessment and inventory and economic benefits.

The Division will be reviewing educational and outreach components across all divisional programs.

DNR Forestry Specialist Teams

810. We support the need for the inventory and assessment, but what's the intent?
"Capacity" needs to be better integrated throughout the UF pages in this document – what's our role.

There are costs associated with the assessment and inventory and economic benefits.

The Division will be reviewing educational and outreach components across all divisional programs.

Division of Forestry staff

811. Agree. Targeted education, outreach and solicitation of project sponsorship should be aggressively pursued to help fund these inventories and assessments.

Division of Forestry staff

812. I support this intent statement as written.

Division of Forestry staff

813. I'm in support [of proposed change].

Division of Forestry staff

814. UF-4: Agree. I'm surprised this is not in place now. It would seem to me that you would need to know what you have before you can manage it.

Division of Forestry staff

PUBLIC COMMENTS

815. Strongly disagree with increasing investment in urban inventory and assessments UNLESS the fiscal resources to support this investment come directly from the existing Urban Forestry Grant program.

M. Luedeke

816. WWOA does believe that UF-4 is a good investment to ensure that our urban forestry is on track to support further investment.

L Hanson, WWOA,

817. I applaud the focus on a coordinated Statewide UF Inventory. This is an item that the Urban Forestry Council has long supported.

K. Ottman, First Choice Tree Care, Junction City, WI

818. As you know, the Council has supported a statewide inventory and assessment of the urban forest for the past several years. Thank you for including this item in your draft. Having a baseline of forestry information will benefit all urban forestry within our state.

K. Tuttle, Wisconsin Urban Forestry Council,

UF-5

<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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DNR STAFF COMMENTS

819. I don't feel we perform a ton of outreach beyond emails, the Fall Workshops, collaboration with WAA and periodic individualized coordinator efforts or in tandem with UW-Extension, thus I don't see a big change, but the current efforts should be identified as well as the proposed decreases to be sure everyone is on the same page. I do have huge concerns of how or where we are going to develop these partnerships in small communities as it seems the current infrastructure for this work is at a minimum.

Division of Forestry staff

820. Better define or identify the services we will provide. (ie. CTMI, workshops, annual conference, Insider, newsletter, etc)

Strong support for web outreach.

In light of partnership emphasis and customer service there may, in fact, be a need to increase the investment, not decrease it.

"Decrease" is misunderstood.

The outreach plan needs to be developed and evaluated *before* any recommendation should be made to increase or decrease funding.

Increasing partnerships is in direct conflict with decreasing the outreach programs.

Proposed change says to decrease investment, but opening narrative says to do it in next two years – conflicting statements?

Does this include outreach to partner organizations?

What are Divisional responsibilities? (ie. champion tree, poster contest, etc)

A decrease in investment does not mean it is not important.

Concerns about outsourcing some of UF's existing outreach programs (ie. CTMI).

Commitment is not compliance.

DNR Forestry Specialist Teams

821. Focus will also move to stimulating professional associations, technical colleges, UW Extension and the private sector to provide arboricultural training to field workers. The Wisconsin Arborist Association's "Introductory Track" at its annual conference is a recent example of success.

Division of Forestry staff

822. Disagree; this document alone lists some of the very important benefits of an urban forest canopy. We should use these benefits as advertisements for increased investment from the public. Let partners do this too but if we don't stay involved through the whole process, we are no longer partners and have just become a teacher – student type of relationship.

Division of Forestry staff

823. What that goal makes me think of is that when we're at the State Fair, almost all the questions we ever get are urban forestry questions. Makes me think we should be doing more urban forestry education.

Division of Forestry staff

824. Better define or identify the services we will provide. (ie. CTMI, workshops, annual conference, Insider, newsletter, etc) Strong support for web outreach. In light of partnership emphasis and customer service there may, in fact, be a need to increase the investment, not decrease it. "Decrease" is misunderstood The outreach plan needs to be developed and evaluated before any recommendation should be made to increase or decrease funding. Increasing partnerships is in direct conflict with decreasing the outreach programs. Proposed change says to decrease investment, but opening narrative says to do it in next two years – conflicting statements? The rest of us have to "catch up" to the process, the recommendations, the changes and the efforts/products produced, we need to see some patience and understanding during our learning curve. We need to first understand the implications of the changes to how we do our job and what it means to me before I can relate to the big picture strategies. UFWG would like to have a role in developing the urban forestry resource allocations within FLT parameters and deadlines. We are passionate about our work and the customers we serve. We have a great program and we are very innovative.

Increasing partnerships is an intriguing concept.

The secrecy used in the bucket team process stimulated mistrust and created bad feelings and worked against team building.

Developing partnerships is a huge time investment and may be more time consuming than dealing with a small community.

Many of our new TCUSAs come from small communities.

This doesn't address our historic relationship.

Our "DNR face" and "go to" connection to the communities, regardless of size, will be lost.

"Uniting communities" isn't happening now (even when they share the same street); why do we think this will occur in the future.

I need to get my foot in the door first to build capacity long term – we are the ones to do this.

Focus should be on where we can get the biggest bang for our buck (ie. larger projects); are we focusing too much on personal preferences.

Will the new direction stifle the innovative things we currently do?

Small communities are distributed across the state; metro areas are not.

When we meet with the city forester, regardless of community size, its like meeting with a trainer and a broader leadership outreach as this person networks with multiple contacts within the municipality (triangle concept).

In the real world, opportunities may not exist to develop partnerships.

Not increasing funding to the grant program goes against our current grant revamp process.

A decrease in investment does not mean it is not important.

Concerns about outsourcing some of UF's existing outreach programs (ie. CTMI).

Commitment is not compliance.

Maybe all employees don't have to have "ownership" in the final product, rather recognize it's OK to simply accept this as the new direction that management deems is best for the division based on current realities.

Does this include outreach to partner organizations?

What are Divisional responsibilities? (i.e. champion tree, poster contest, etc)

Division of Forestry staff

825. Sounds pre-mature to state a decrease in I and E investment before the statewide assessment is completed.

Division of Forestry staff

826. Disagree. To the contrary, we should be increasing our outreach investments and educational efforts. We should be targeting such efforts and actively pursuing partnerships that have potential to generate widespread public support and additional revenue sources in support of the greening of our communities.

Division of Forestry staff

827. Get out of the Tree City USA project. The urban forestry program spends a lot of time on it and I think the benefits are pretty minimal. Let the arborist association run Tree City. Use this staff time to help the smaller communities that need the DNR help the most.

Division of Forestry staff

828. I applaud the new emphasis of working more with small communities. These communities often do not have the resources, especially when related to trees.

Division of Forestry staff

829. I'm concerned that the paragraph preceding the UF-5 Proposed Change and UF-5 are in conflict. A decrease in education and outreach is proposed at the same time an assessment of the need for those activities is proposed. Propose the assessment and work with the results.

Division of Forestry staff

830. The idea that needs to be conveyed is that urban forestry program staff will not do general public education and outreach; general public outreach will be incorporated into the division's overall effort related to forestry outreach. Urban forestry program staff will continue to do targeted education and outreach that is focused on partnerships that can provide services and tools to local governments and organizations working in small communities and those without active urban forest management.

Division of Forestry staff

831. If you want to have an effect on the entire urban forest, E.&O. is essential in reaching the general public who own the vast majority of the trees in a community.

Division of Forestry staff

832. "The Division will decrease" Why decrease? The prior paragraph state within the next two years, an assessment will be conducted. 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.

Division of Forestry staff

833. I am hopeful that the Arbor Day Foundation (p.22) has desisted in promoting the use of invasive trees.

DNR staff (non-Forestry)

834. UF-5: Disagree. How can the other proposals with the Urban Forestry side of DOF get done if outreach and education are not part of the "system"? If the DOF is not going to do the outreach and education, what organization or agency will do this?

Division of Forestry staff

PUBLIC COMMENTS

835. Agree that the DNR should foster development of urban forestry services in the private sector and/or encourage local municipalities to develop professional staff expertise.

M. Luedeke

836. We concur in F-5 because of our comments on F-3, utilization and marketing of our forest resources is important to assure forest management.

L Hanson, WWOA,

837. The concept of UF 'getting out of the public information business' needs to be supported by a statement reflecting that this function will continue as an essential function of the Division, but not within specific disciplines.

K. Ottman, First Choice Tree Care, Junction City, WI

838. The other area of concern is the decreased investment in outreach and education initiatives. Again a clearer definition of what outreach and education the DNR will be involved with is needed. Education of the public and government officials is vital to the future of Urban Forestry. Partnerships involving the DNR and other entities should be explored and become a key component of this new strategic direction. The WAA and the DNR just held its 20th Annual Conference with over 500 attendees coming together to learn about urban forestry topics and network with other groups and communities. Events like this can incubate the partnerships that align with the proposed role of the DNR Urban Forestry Program.

B. Pelot, Wisconsin Arborist Association

839. The reduction in outreach and education needs to be clearly defined. As explained during our meeting, outreach and education will not be reduced; it will simply be completed by others with marketing experience within the Division. It is good sense that a marketing specialist would complete outreach and education with assistance and technical information from urban foresters. If another unit within the Division of Forestry will be assuming this role that needs to be clearly stated and referenced.

We recognize that budget constraints are severe and will have large impacts on all of forestry, the Division of Forestry, the Department of Natural Resources and the state. The Urban Forestry Council sincerely appreciates the support which has been provided to the urban forestry program.

Thank you again for your time and attention to this matter. Please feel free to contact me should you have any questions.

K. Tuttle, Wisconsin Urban Forestry Council,

UTILIZATION & MARKETING (UM)

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.

DNR STAFF COMMENTS

840. The strategic direction is calling for an increase. I understand that utilization and marketing are very important to forestry and the citizens of the state. It is hugely important to the continuation and growth of the forest products industry in the state and in turn all of forest management. My question is whether this should be the DNR's role. I assume we do not have the knowledge and expertise at this point. The industry itself has the most at stake and should be investing in this knowledge. Could or should this program be run by universities or extension?

Division of Forestry staff

841. Agree with increases here. We need industry to support our management efforts on all ownerships.

Division of Forestry staff

842. An idea may be to use the term public-private partnerships when referring to the work of forestry consultants or in the utilization and marketing sections.

DNR staff (non-Forestry)

843. Agree with our role and changes. While generally I agree with most of this document, I disagree so strongly with some of it I cannot agree to it overall. I am concerned that some of the recommendations are not attainable - or even realistic. I also believe that some of our "partners" feel their role is to "take the best and leave us the rest" in some issues like private forestry - which in my humble opinion - is not a good partnership for us to be involved in, if that in fact is the case.

Division of Forestry staff

844. I agree with this proposal.

Division of Forestry staff

845. Not being that involved with utilization and marketing I would agree that continuing to remain informed about new opportunities is extremely important.

Division of Forestry staff

846. The Utilization and Marketing section of the forestry division is made up of very few people. It seems to me like there would be a great advantage of having a person in the northwoods that would be concerned with the current utilization and marketing of the forest products that are currently being harvested from state and MFL lands. There are many concerns such as the changing markets and the importance of accurate cruising systems that would warrant a person in northern Wisconsin. I do agree that it is important to look for new markets and new utilization techniques but it is also important to have ties with the current times and the current problems that are occurring on our timber sales.

Division of Forestry staff

847. Yes more knowledge and work with this "wood" be great.

Division of Forestry staff

848. Under Utilization and Marketing, it makes sense that the focus would be economic in nature. However there was one sentence, not an intent statement, that struck me. Page 24, the last sentence before the first intent statement. "A strong and diverse industry drives the markets for forest products which then provide the economic incentive for sustainable forest management, helping to keep forests in forest." While I understand we have to manage in a way that is

also economically sustainable, I was under the assumption that we manage our state lands for ecological needs based on master plans. We do not manage for an economic incentive. In other words, the economic benefit is not the drive in determining management strategies. Maybe I am reading too much into this sentence, but it just stood out to me.

Division of Forestry staff

849. The Utilization and Marketing section describes various markets for wood, including “biomass and bio-fuels”, and discusses assistance to companies and benefits to the economy. It should be noted that the use of wood for biofuels does not provide nearly as many jobs as wood that is used in other processes. Forestry’s programs should encourage industries that focus on secondary processing and provide high levels of employment, as these companies will provide the greatest economic benefit.

DNR staff (non-Forestry)

850. The BWM agrees with the overall direction of the Division outlined here. We encourage the Division to think broadly about forest markets. This includes woody biomass and markets that address ecosystem services that forests provide (e.g. water quality, wildlife habitat, carbon storage??). The BWM and its partners are willing to help develop markets for biomass utilization on state-owned lands. This could help our partners to meet goals for forest management while also helping to develop markets that could be more broadly applied to the region.

The BWM appreciates the utility of FIA data for making sound forest management decisions and supports the continued investment levels. Working together, we could add some ecological monitoring to this program, which would expand its utility for forest ecosystems. This type of information would allow us to make better decisions for landscape scale planning and conservation delivery.

DNR staff (non-Forestry)

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

DNR staff (non-Forestry)

852. Agree, but how will these be financed?

Division of Forestry staff

PUBLIC COMMENTS

853. Proposals look good.

P. Dayton, Vernon Co.

854. Agree with role and proposed change.

G. Rebman, USDA-NRCS

855. I think that the Division needs to work hard to get the wood to market at approved Plan levels (the ASQ) in uniform annual amounts from all applicable public lands, including working to get the federal lands meeting the Plan ASQ, and private lands. In addition complete Management Plans on all State lands and determine and meet the ASQ where appropriate.

N. Paulson

856. In the first paragraph under the Division of Forestry’s Role subsection, we believe you should add to the ‘investment in efforts’ list the investigation into modified or new harvesting techniques and methods to support the biomass/bioenergy markets. The language in the Proposed Change recommendation is certainly broad enough to cover the proposed addition, but the supporting text is not detailed enough to emphasize this need.

Similarly, in the same paragraph, we believe you should add a parenthetical statement or a reference to the new, evolving markets such as biomass or bioenergy to explicitly highlight these innovative markets. These new, evolving markets have

the potential to support or enhance the existing forest products industries, but they need the Division of Forestry's specific assistance to ensure their viability.

Somewhere in the Utilization and Marketing section, a paragraph should be created to highlight the relationship and market support between the existing forest products industries. Similarly, the new, evolving biomass and bioenergy markets could provide additional support to the existing forest products firms. For example, the collection of harvest residues could help support a vibrant pulpwood market and vice versa. One could also indicate that the development of these interrelated markets will help ensure a vigorous and healthy forest that is at lower risk to forest fire, disease, and invasive species with the sustainable removal of the harvest residues.

...

We believe your opening remarks in the Challenges and Opportunities paragraph within the Utilization and Marketing section properly describes the current state of affairs in the forest products industry [1]. While the current market conditions are stressful, there are opportunities for an expansion of the forest products industries, including traditional and innovative markets. We believe by addressing the few points identified above, more vibrant and stable forest products industries will result. Furthermore, we believe the Division of Forestry will be more responsive to the needs of the forest products industries.

D. Donovan, Excel Energy

857. I was very pleased, and relieved, to see recommendations that the Division of Forestry maintain and even increase the level of effort that it puts into assisting Wisconsin forest product industries with this. Not only will this help to address current political concerns for assisting private industry and increasing the number of jobs in our state, but this form of assistance can be of great importance to making sure that the raw forest products available for use by state industries are allocated most effectively.

I realize that comment might have just raised your eyebrows a bit, as some persons might insinuate from it that I am suggesting a little bit of back-door communism (State allocation of resources?!?). So, I will expand on what I am getting at.

During most of my forestry career I seldom heard much concern about our state's forests not producing enough wood for the overall demand created by forest products industry in the state. Granted, there were some isolated shortage concerns (Shortage of oak lumber, shortage of pine pulp for paper industry before most mills switched to hardwood, etc.) but most of the time we were scrambling to find markets for most of our wood.

Then, during the past two years the issue of woody biomass production has arrived and research done by the UW, DNR, and others shows that there might actually not be enough wood out there to feed the paper mills, produce current levels of lumber and veneer, and still provide sufficient wood biomass for large-scale production of energy to be used in various forms within the state.

If large-scale demand for wood biomass to be used in energy production does develop, DNR must play a significant role in determining how the wood available in the state is utilized to maximize the positive economic benefits while avoiding ecological damage from over harvesting. Here again, as in relations with fire departments, will be a high level of need for diplomacy, patience, and "people skills"; as well as providing comprehensive and accurate information to industry, the legislature, and other interested parties.

T. Salzmann, Sandhill Land Services, LLC

UM-1

<p>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)</p>
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DNR STAFF COMMENTS

858. I wasn't sold on this intention statement until I heard Wendy McCown speak about it at yesterday's Neillsville's statewide. I'm in full support of it after hearing what she had to say. Without wood using industries, there is no economical management of forests. This already happened in many parts of the West and Alaska. Some communities there have suffered greatly, and any management of forests (e.g. thinning) is costly.

Division of Forestry staff

859. This seems to align with the incoming administration's priorities, so it seems to make sense to invest in expanding the forest industry.

Division of Forestry staff

860. I Agree that this is an important investment. We NEED the industries to be healthy in order to sustainably manage our resources. If well focused and helpful to industry, any investment we can make to ensure WI forest industry is competitive and successful are resources well spent. No one else is positioned to do this.

Division of Forestry staff

861. Agree. This should also include establishing a short course and creating readily available tools & tips for DNR foresters to enhance their skills at dealing with forest industries as a first line contact at the local level.

Division of Forestry staff

862. Doesn't this overlap with the work of the new Department of Commerce? While I feel this is desirable work to accomplish maybe the Division would be better served to have a liaison that would supply information to Commerce?

Division of Forestry staff

863. Note: Very good! I wholeheartedly support this.

Division of Forestry staff

864. This is a good emphasis on jobs and Wisconsin's business environment.

Division of Forestry staff

865. UM-1 should be a very high priority for the Division, but also one where we work to develop the abilities of partners.

Division of Forestry staff

866. Agree. I just question how the state can continually adjust to markets when working with timber sale contracts. Within a 2-4 year contract, markets can fluctuate greatly.

Division of Forestry staff

867. Great to see more time and money invested in this area.

Division of Forestry staff

868. The proposal to increase investments in marketing development and retention would, we assume, include biomass markets. Here we echo the question above regarding the biomass markets and the need to address policies for biomass production on state lands.

DNR staff (non-Forestry)

PUBLIC COMMENTS

869. I doubt professional marketing is a proper role for a public agency.

A. Ode, Bayfield, WI

870. Agree to maintain at current level but not increase. Other forest products expertise exists outside of the DNR and should be utilized such as U.S. Forest Products Lab, UW-Madison, and UW –Stevens Point, Natural Resources Research Institute.

M. Luedeke

871. See my comments above. Industry needs help getting the supply side up and running. They can handle most of the marketing work. No increase is needed here now.

N. Paulson

872. We concur with UM-1 as long as it is done with our research institutions and their marketing expertise. For the Division to invest in their expertise at a time of state budget problems and position vacancies due to public policy is not a good budget decision.

L Hanson, WWOA,

873. UM 1,2 Both proposed changes to the U&M program are supported by the Paper Council. Specifically, increased investment in utilization and marketing expertise to assist existing and new forest industries to retain and development markets (UM-1) and the investment in the Forest Inventory & Analysis at the double intensity level (UM-2).

E. Gustafson, Wis. Paper Council

UM-2

<p>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)</p>

DNR STAFF COMMENTS

874. The question is whether the FIA is federally driven and subsidized? If the investment is solely WDNR than can this not be an increased investment into WISFIRS? Is this not a continually updated database of samples from across the state with real time data? Any data that may be missing comparing the 2 systems could be developed and added to WISFIRS for inventory analysis. Just appears at face value there is any opportunity here for one inventory system.

Division of Forestry staff

875. I have not been convinced on the benefits of the intensity of the FIA inventory. If there is a additional cut needed this is where I would consider it first and or go back to the core data we are collecting to reduce costs.

Division of Forestry staff

876. FIA investment should continue.

Division of Forestry staff

877. Agree.

Division of Forestry staff

878. I noticed CFI was not mentioned on page 25 - not sure if it should be included or not

DNR staff (non-Forestry)

879. I think it is wise and desirable to continue with this.

DNR staff (non-Forestry)

880. I do not think the double intensity level is needed. A more basic intensity level could be used which would save money.

Division of Forestry staff

881. Increasing the intensity is a good idea to get a picture of the resource at a smaller scale. I'm not sure if this will get at the issue of the resource in a more parcelized landscape and the marketing challenges associated with that, but it is a step in the right direction.

Division of Forestry staff

882. We strongly support Forestry's continued high level of support for the Forest Inventory and Analysis program; it provides a major planning tool for public and private lands.

DNR staff (non-Forestry)

PUBLIC COMMENTS

883. Strongly agree to continue investment in statewide forest inventory and analysis efforts.

M. Luedeke

884. Agree. Need quality data to manage.

N. Paulson

885. FIA (UM-2) has historically proven to be a valuable tool in managing our forests and guidance for our paper and other wood industries. We believe the decision to continue in its investments is the right thing to do.

L Hanson, WWOA,

CROSS-PROGRAM ACTIVITIES (CP)

DNR STAFF COMMENTS

886. I liked all the cross program activities.

Division of Forestry staff

887. This section is akin to the support, infrastructure and backbone for Division of Forestry. It does play a role in providing the linkage between programs.

Division of Forestry staff

888. Cross-program activities are essential but the public sometimes needs to be informed to make the connection.

Division of Forestry staff

889. I like the concept of the Cross Program Activities and appreciate the recognition of the essential nature of each of the items described. I especially support the commitment to CP-3, CP-4, CP-5 and CP-8.

Division of Forestry staff

890. On page 26 paragraph 3 - this may be an area where the use of social media or short video clips may be a future option

DNR staff (non-Forestry)

891. Many of the strategic directions identified here have an impact on private forestry and partners we are increasingly relying on to provide services to private woodland owners. These efforts need to be supported so that we can build the quality and capacity in the private sector.

Division of Forestry staff

892. Cross program integration, and the benefits that it could yield, were not adequately addressed during the Strategic Direction process.

Division of Forestry staff

893. I agree with this proposal. Questions: why is forest genetics not included with 'nurseries'? Isn't it all one program. I don't see a cross-over here that is any more relevant than other cross-overs (like forest health).

Division of Forestry staff

894. Good.

Division of Forestry staff

895. The BWM agrees with the Division of Forestry on the overall direction and emphasis of this section. However; we feel that this section would benefit from more direct analysis of how the Division can partner with BWM, BER and external partners to realize some of these goals. While Forestry is certainly a leader when it comes to shaping statewide forest policy and managing Wisconsin's forests, they are not the only group with a vested interest in a successful program. Acknowledgment of this, and some thought towards potential collaborative efforts would make the overall Strategic Direction more successful as a document and as an overall policy.

DNR staff (non-Forestry)

896. Agree with all the proposals for the Cross-Programs Activities, but these are VERY ambitious. Are the personnel in place? If not how are all these activities going to be implemented and how will they all be financed? Where is the money coming from?

Division of Forestry staff

PUBLIC COMMENTS

897. Agree with role and proposed changes.

G. Rebman, USDA-NRCS

898. The greatest potential for enhancing the partnership between the Forest Service and the Division of Forestry is with Cross-Program Activities. Agreement was evident about genetic research on wider varieties of species and experimentation with a range of seedlings to counter the effects of changing environmental conditions. We are interested in more collaboration on deer management issues, energy strategies, biomass practices, and carbon market analysis. As the State of Wisconsin moves forward with improvement of IT & GIS, so does the Forest Service. Sharing resources and eliminating duplication of efforts with IT & GIS could create greater efficiency and allow for better management decisions based on improved data. Also of mutual benefit will be well-educated, highly trained, and experienced employees.

P. Strong, CNNF

899. WWOA supports cross-program activities as advocated in the draft.

L. Hanson, WWOA,

900. We think an assessment of Outreach and Education is important (CP-4). There are many opportunities for partnership in outreach and education on forestry issues that could be understood through a more formal assessment. Assistance to other divisions (CP-9) should be strengthened. Although all the stated collaborations make sense to maintain, we encourage DNR Forestry to consider how stronger ties and collaborations with DNR Wildlife and Endangered Resources might strengthen a more holistic vision for Wisconsin's forests and potential products reaching and inspiring landowners. For example, every DNR Forester should read, understand and however possible, implement applicable actions within the State Wildlife Action Plan. Materials generated through DNR Forestry should contain elements of the State Wildlife Action Plan for a more holistic perspective on topics or issues.

J. Greenberg, American Forest Foundation and Aldo Leopold Foundation

901. We feel the Cross-Program Activities section of the document merits some discussion. It is difficult to assess where some of the areas discussed in this section fit into the pie-chart illustration. The argument could be made that the 1% decrease in county forest investment will be offset by gains to areas identified in this part of the text document. The county forests will potentially benefit from an increase in research, IT & GIS, genetics and forest economics, and policy analysis.

J. Severt, Wisconsin County Forests Association

CP-1

Forest Sciences

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)

DNR STAFF COMMENTS

902. Agree. However, there are also several specific silviculture/forest ecology and hydrology areas that we should focus for increased investments. These might include northern white cedar, swamp hardwood/ash and terrestrial invasive species.

Division of Forestry staff

903. Forest genetics needs to be attached and integral with the nursery program. One should support the other - solving problems, with man power, and funding.

Division of Forestry staff

904. I didn't quite get this one. It almost read as though now that the Karner Blue HCP is completed - we don't have to do as much for endangered resources management. I'm not sure that is what you meant - but that is the way it reads, and that strikes me as odd.

DNR staff (non-Forestry)

905. One thing that our bucket team heard from the field, and I used to hear the same thing in nurseries, was the desire for more support in applied silvicultural research. The field foresters want and need more practical information to improve our silvicultural systems and other management techniques. The USFS and universities are driven by broader issues that generate grant money (e.g., climate change, carbon sequestration, invasives, monitoring and assessment issues), and they no longer work on smaller, more applied issues like they used to when there was a large network of research stations. The Division should fill this niche because there is nobody else that will. I place a great value of this knowledge base (I think others do too) and would decrease our investment in current management (for example, time spent on allowable harvest goals) in order to gain more current research and better management in the future. A small investment would go a long way. We will be more credible as a Division if we are the leaders science-based sustainable management practices.

Personal bias, but I agree with an increase in the forest genetics program, especially if we emphasize more than just tree improvement of a few species. Incorporating a broader understanding of forest genetics in our silvicultural systems will help us better deal with our rapidly changing forest systems. Forest genetics work is slow and difficult, and here we can really build upon the past by taking advantage of 30+ years of Wisconsin based research and apply it to more than just traditional tree improvement work. Our Lake States partners in forest genetics should also play an important role.

Division of Forestry staff

906. I think that there should be an increase in silv/forest ecology and forest hydrology's level of investments. The investments should be increased to include training sessions or at least information on the operation plans for implementing some of the new rules. Example: Implementation of the green tree retention guidelines. We are given requirements of how many trees or what % canopy to reserve but there is no guidance or assistance about how to implement this. It is true that on all properties the answer would be different and all stands are different but at least a little guidance or information from what other people have done that worked well or didn't work well would be much appreciated!!!

Division of Forestry staff

907. I think the Division needs to work with Forest Sciences on the management of the landscape when pertaining to certain species, especially Northern Goshawks. Many acres are not being managed due to finding goshawk nests within potential timber sale areas. These goshawk nests are being found on numerous timber sale areas. A lot of additional time is needed to establish or administer these sales (depending on when the nest is found).

Division of Forestry staff

908. (CP-(1-3) Outstanding to see increased investments in genetics, forest economics, IT, GIS and research. Will this be done on the specialist level, with work teams of field and supervisory folks, or will the Department look to hire and/or contract out?

Division of Forestry staff

909. I appreciated the recognition of the role of specialists in consulting and providing the scientific basis for Forestry Division's work. Item CP-1 proposes maintaining current investments, but it's unclear if that includes position of Forest Ecologist/Silviculturist, which has now been vacant for 18 months.

DNR staff (non-Forestry)

910. The BWM agrees with the importance of forest science and research. We have a few comments under CP1 and CP2: Future climate change scenarios, as outlined by the WICCI Forestry working group, will have profound impacts on the Division's mission. Shouldn't there be more of an emphasis on this planning effort under the CP1 direction statement? Climate Change will also challenge the wildlife resources within forests and the BWM anticipates working collaboratively with the Division of Forestry to meet these challenges.

The statements regarding a change in support for rare species conservation was a bit confusing. Please clarify whether you will re-allocate resources towards higher priorities for rare species or towards higher priorities in the program as a whole.

DNR staff (non-Forestry)

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

...

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

DNR staff (non-Forestry)

912. Please clarify the proposed shift in endangered resources management here; the statement seems tied to the Karner Blue HCP. Does Forestry intend here to reduce support only for the Karner Blue HCP? (If so, how?) Or does this intention extend beyond the Karner Blue program?

DNR staff (non-Forestry)

PUBLIC COMMENTS

913. ...given the current interest in the Strategic Direction Plan, the decline in nursery production (for many reasons), and the interest in forests and climate change, let me remind you all about the goals of the WI Forest Genetics Program. This language below is drawn directly from our 2009 ten-year plan, but it has appeared in the earlier versions as well. I would especially call attention to the 'long-term goal' (italicized below) dealing with biodiversity.

Now, whether one sees the role of applied forest genetics as producing seed for the nursery system, or also including the conservation and management of biodiversity, is a matter of perspective. I believe we can occasionally focus too narrowly on some details of history or current management practices and fail to appreciate the larger role of considering genetics within silvicultural systems. Admittedly, it is much easier to view tree improvement from the perspective of seed orchards as a short-term activity for a few species (e.g. red pine). If a few species that were favored by forest industry have declined, perhaps 'productivity' per se should no longer be the main goal of the nurseries -- they could shift focus to other species, e.g. hemlock, for which 'restoration' is a current interest.

What we sometimes fail to note in thinking about genetics and tree improvement is that Wisconsin's forests have just experienced the greatest set of disturbances since the last ice age, i.e., the past 150 years have 'reshuffled the deck' so to speak (and maybe dropped a few cards in the process) for many species and we do not really know even the approximate limits of species' adaptability except for one or two. Learning the possible genetics outcomes of these (past or future) disturbances is much less straightforward than tree improvement per se, but it would still be very useful to know, even approximately. Models and intuition will be important here in extending what we do know to what we don't.

So, where should the genetics program be placed? Under nurseries? Or cross-boundary activities? Or somewhere else? Or more than one place? I am happy to discuss this but do not believe that a current Strategic Directions Plan can offer more than a road map for this - it certainly cannot provide an immediate answer. I do not believe nurseries are passe, although it seems clear that the days of 10,000,000 red pine each year are over.

...

Goals of the Wisconsin Forest Genetics Program

In this plan, goals are viewed as ideals that cannot be precisely quantified in terms of time or cost requirements to completion. Goals may or may not be attainable during the life of the plan. They serve as targets for overall program direction. Within this framework, the tree improvement program in Wisconsin has two important goals:

1. the development of biologically sound tree improvement practices that lead to increases in forest productivity and forest health on forest lands in Wisconsin;
2. the conservation of forest genetic resources in long term breeding programs in order to maintain a broad genetic base that can provide future ecological benefits and accommodate potential future changes in climate, pest pressures, forest management practices, or demand for products.

The first goal relates to the process of tree breeding and domestication, which can be approached in a manner familiar to all plant breeders. Within the limits of genetic potential, we wish to select and propagate trees that provide products valuable to human use. The second goal relates to questions of ethics and gene conservation that must be addressed at regional and national levels. Our concern is to minimize the erosion of genetic variation in native populations and in long-term domestication programs. This second goal is directly related to the Department's mission of preserving biodiversity, especially at the genetic level (Addis et al., 1995) as well as the 2004 Statewide Forest Plan objective to "Conserve, protect, and manage for biological diversity and support continuing research on biological and ecosystem diversity." Both goals are integral parts of a long-term tree improvement program.

In the short-term our efforts concentrate on using available information and resources to continue to improve the genetic quality of our present-day forest tree nursery stock. Significant achievements are possible here while also advancing investigations into conservation and breeding activities for species with great ecosystem restoration value.

Our long-term efforts involve maintaining a broad genetic base so that future selection and breeding efforts are not constrained by an impoverished genetic resource, e.g. maintaining biodiversity at the genetic level. This broad genetic base will be especially important for species under threat from climate change as well as other climate stressors.

Dr. R. Guries, Department of Forest and Wildlife Ecology, UW-Madison

914. Agree to maintain expertise in BMP, hydrology, and silviculture. No new increase needed in forest genetics since a position is already established and assigned identified to handle this function. If more genetic research is needed, then UW-Madison or UW-Stevens Point is more appropriate agencies to conduct research. Not sure what the shift in endangered resources and HCP suggests but if extra time becomes available, then this time should be shifted to forest economics.

M. Luedeke

915. Agree. Need to add social study to the genetics and economics increases.

N. Paulson

916. We concur in CP-1, CP-2 and CP-3.

L Hanson, WWOA,

917. The identified proposals throughout this section appear sound and beneficial. Two are particularly supported by the Paper Council. One is the reference at page 26, under the discussion of Forest Sciences, to "...increasing our investment in forest economics in light of the critical role forests play in the state's economy and the impact economic drivers have on forests themselves."

E. Gustafson, Wis. Paper Council

CP-2

Research

<p>Proposed Change: The Division will modestly increase funding for 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)</p>

DNR STAFF COMMENTS

918. Research \$ should reflect additional shift to field applications. Question direction \$'s are being spend in what appears not truly addressing basic silvicultural concerns the field is having.

Division of Forestry staff

919. Agreement that it is important to maintain the program expertise of the science in a changing eco-environment.

...

Agreement that it is important to make decisions based on sound science and up to date science. It is becoming increasingly important to make decisions based on the science and not an arbitrarily set data point. This diminishes credibility internally and externally.

Division of Forestry staff

920. Science will have nothing to do with deer herd management for the next 4 years, don't commit a lot of money to this when the data is likely to be unused.

Division of Forestry staff

921. Agree. This could also be addressed through my above comments in CP-1.

...

operational direction may affect, and perhaps even alter some of my remarks.

Division of Forestry staff

922. Instead of only highlighting deer you may want to have something about 'adaptation of forests to a changing climate, regeneration challenges economically important tree species, etc. Just a thought.

DNR staff (non-Forestry)

923. There needs to be a way to coordinate research and publicize results across programs and teams.

Division of Forestry staff

924. I think that it would be very beneficial for research to assess priorities of their research on what the field personal might need assistance with. For example, regeneration of species such as white and yellow birch or harvest techniques in lowland red maple stands that will regenerate red maple and not muscledwood. These are age old questions that still remain unanswered. We should not loose focus on our current needs just to keep up with new research topics, such as biomass harvesting and no biomass plants to utilize the wood and no practical way to harvest the material and transport it effectively.

Division of Forestry staff

925. Research should be done to improve management issues on the ground. Sometimes the research seems too advanced to try and apply it at the field level.

Division of Forestry staff

926. Hoping that silviculture input from the field is sought and that silviculture training is expanded to field foresters.

Division of Forestry staff

927. Genetics research is mentioned but the discussion is very brief. I would like to see it expanded to describe which of the changing environmental conditions are to be addressed through this work, and to further define the tree species (e.g. native vs. non-native) and types of adaptation that are anticipated.

DNR staff (non-Forestry)

928. The BWM welcomes support to better understand and communicate the impacts of the deer herd to forest health and regeneration. We also welcome the opportunity to develop a collaborative process that helps to better define science needs for forest management (CP-2).

DNR staff (non-Forestry)

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

DNR staff (non-Forestry)

930. The draft states under “Research” that Forestry intends to contribute information to the debate over deer management, which we strongly support and welcome. This would reflect the intentions in the Forest Strategy (specifically Strategies 17 and 18) to bring a greater forestry presence into the debate, with increased emphasis on impacts of deer herbivory on our forest resources. This is excellent.

DNR staff (non-Forestry)

PUBLIC COMMENTS

931. May be O.K. if not redundant to other agencies activities. (CP 1,2,3)

A. Ode, Bayfield, WI

932. Can’t support this research proposal until more information is provided. Already significant resources committed to forest research and if appears that the DNR invests more financial support in WDNR’s current research program than is returned in useful outcomes. Not willing to support any increase until more information indicates where the resources will be taken from and what additional outcomes will be expected. Research is more appropriate role for UW-Madison and UW-Stevens Point.

M. Luedeke

933. Agree.

N. Paulson

934. We believe your Research subsection needs to be made more robust by developing partnerships with more entities than just the research institutions, i.e., universities, possibly with existing or new market participants. In addition, more emphasis should be placed upon developing the necessary research to better define sustainable forest/agri-forestry management for open and closed loop biomass production. This information could then be used to develop sound policies on the use of Wisconsin’s forest for a wide variety of products including biomass or bioenergy. This research could also help resolve the life cycle analysis debate of using biomass as a source of biopower and biofuels.

Appendix

Most of the comments mentioned above should be incorporated into various elements of the Appendix. For example, the removal of harvest residues could be cited in:

Paragraph E covering Sustainably Managed Forests;

Paragraph G covering Landscape Scale Planning;

Paragraph J covering the management of Invasives; and

Paragraph K covering Biomass in general;

Similarly, the management of urban forests (Paragraph I) should include references to using biomass from prunings, thinnings, and removal of downed or dying trees for bioenergy purposes.

We are confident that as you review our comments in the context of the Appendix, other opportunities to enforce additional paragraphs will arise including the Mitigation and Markets paragraphs.

D. Donovan, Excel Energy

CP-3

IT & GIS

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

DNR STAFF COMMENTS

935. There is a huge need for increasing investment in internet support staff as well as GIS staff (particularly if we intend to ramp up IT support staff to county forests). I am well aware of this need having worked on the DNR forest health internet resource.

Division of Forestry staff

Major note of concern is the investment in GIS based databases (WISFIRS). This program has faced many delays and has continuing development cost escalation. At project conception the Division and world was in a different IT environment. Now 4 years after first implementation there may be products and operating environments out there, which could better serve and more effectively complete the intent of the project. There is considerable risk in developing a platform with an outside contractor on a platform that is continuously changing and customers and externals may be in positions where they are using different operating systems. Efforts should be employed to evaluate new "off the shelf" GIS solutions that would fulfill the spatial data management needs of the DOF. At minimum, there would probably be value in doing an external review of the development project to determine current investment and future on-going maintenance investments (i.e cost benefit analysis).

Division of Forestry staff

936. Investment in IT, GIS and best technologies is essential but shouldn't completely displace other modes. At least at the onset, traditional systems and historical connections must be clearly linked and integrated.

Division of Forestry staff

937. Agree- this is a smart and needed investment that will pay dividends in efficiency.

Division of Forestry staff

938. Agree. WisFIRS will never be complete as it will require ongoing maintenance and upkeep. Along with this proposal, I would recommend investing in forestry specific IT/GIS specialists within each region to serve the field.

Division of Forestry staff

939. This is long over due and greatly needed. Also, personnel familiar with specific applications who leave, have taken with them the detailed knowledge needed by the next person making the transition difficult or impossible.

Division of Forestry staff

940. The Division will significantly increase its investment in IT and GIS to support all Division programs. Comments: It is unclear if this would include sharing of the technology developed with our partners. I assume that it would. It is important to make the technology available of facilitate the sharing of technology to support and build better working relationships with these partners whether it is the counties, private foresters or other agencies.

Division of Forestry staff

941. Agree Sounds good, but it has not happen in the last 25 years. IT support has been marginal and cumbersome (in fact I have never had a new computer work after a mandatory upgrade, without a trouble call). Computers changing every other year have impeded use of GIS and training has been poor. Many Forester are self taught or acquired bootleg programs to increase their efficiency. (I use arcview and gps daily and I am not afraid of new technology, being one of the few forest rangers to email fire behavior pictures directly from cell phone to dispatch.) (ie Plantrac not working with new upgrade is an example) (New computer can not play Smokey dvd) Forestry web site is poor and gives the public little real information.

Division of Forestry staff

942. Our Division leadership needs to facilitate a change as to how our computers are serviced. When a new computer is received or and old one reimaged the functionality of many programs is diminished (Arcview, Pathfinder). Our IT folks are not always up-to-speed on all the intricacies of the programs we use regularly. Getting some of these setbacks fixed can take days or weeks to remedy. Find a way to have the John Wright types within the Division to have

administrative privileges so problems related to forestry can be dealt with in a timely manner. Our IT folks seem to be in high demand. Having the machines locked down to the point that a printer driver cannot be installed seems overkill.

Division of Forestry staff

943. Certainly keeping abreast of advances in technology is important. Arcview, fGIS, handheld GPS units, digital cameras, digital recorders, etc. have all been great advances that increase our efficiency and effectiveness. I don't believe that computers need to be replaced simply because the warranty has expired. If it still works and can accommodate any new updates then use it until it actually needs replacement. Communications have certainly been upgraded, but wow, what a black hole! How many channels are enough?

Division of Forestry staff

944. Agree.

Division of Forestry staff

945. There is an implicit assumption that increased investments in IT and GIS will result in efficiencies. Is there data to support this, and is there a threshold beyond which investments become less efficient? I mention this because I've observed work that the county does in IT, and their systems are quite efficient when used in-house where they are able to control the servers and installed software, but there are enormous obstacles in deploying them to outside partners who use different systems. The county spends a lot of time on troubleshooting, and the outside partners continue to be dissatisfied with applications that don't run as well as expected.

DNR staff (non-Forestry)

946. The BWM agrees with the CP-3 program direction and intent. We've recently hired Jeff Walters to do many of the same things and would encourage the Division of Forestry to work with our staff collaboratively over the biennium.

DNR staff (non-Forestry)

PUBLIC COMMENTS

947. There is already a very significant investment in IT and GIS development in the DNR; i.e. WisFIRS. This currently accounts for a huge fiscal drain from other dedicated allotments that were originally justified to meet other needs. IT developments come at a high price and appear to have short useful cycles, often prematurely becoming out of date. Concerned that IT investments, especially software development, are a high risk investment because the technology life cycle is relatively short. Concerned that the DNR will become technology "rich" but very weak or "poor" in field skills and forest management experience.

M. Luedeke

948. Need to know more about the specifics of your intentions to comment.

N. Paulson

949. I strongly support this proposed change. As a tester of WisFIRS (GIS) I have been able to see firsthand what an effective tool this will be in creating efficiencies. As a consultant forester I do a lot of my work online through various county websites and GIS systems which in many cases are more accurate and up to date than systems that I am able to access through DNR. It is much more efficient for me as a single cooperating forester (as opposed to working for a larger company) to do a lot of my data work in the evenings. This becomes less efficient if I only have the ability to access hard copy files in DNR offices.

T. Mulhern Forestry

CP-4

Outreach & Education

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)

DNR STAFF COMMENTS

950. Assessing the Division's role in outreach and education will be a good exercise. If no other institution is committed to this work, I think it is very appropriate that the WDNR do this work, since the work essentially is an investment in the future use/conservation/protection of Wisconsin's natural resources. This is high priority work.

Division of Forestry staff

951. Reaching out to the un-engaged landowner and customer service are two themes that go hand in hand. As you know our department has significantly reduced our face to face customer service and is relying heavily on phone, and internet communications to serve our customers. Frankly this way of doing business is not reaching many of our most sought after customers, those that are not involved or informed of conservation methods or laws. A theme here to consider is that each service center have one CAES representative working the counter daily and that various other program staff become trained to help out with frontline customer service duties during times of need and by a planned work schedule. This would eliminate the need for our CAES staff to travel to distant service centers on a daily basis and would localize the service so that our customers would be getting answers to their questions by someone who lives in the area and has the best understanding of the local DNR staff as well as the conservation methods and laws that apply there. We have employed techniques similar to this in the past and I am sure there are others who could provide good ideas.

...

How does this relate to forestry? I believe that one of our roles is to provide our customers and landowners with unbiased, basic market information, science based forest management techniques, forestry law and forest recreation information. Many times in my career I was able to steer walk-in customers to a reputable industry partner that resulted in a successful timber sale with proper forest management and fair monetary compensation. Also through my career many conversations with walk-in customers regarding burning laws and safety have prevented forest fires or illegal debris burning. Now that our service center is only open 1 day a week I seldom if ever have any contact with the public regarding forestry issues. Many of my staff agree that we need to strengthen our customer service and open our doors five days a week.

Division of Forestry staff

952. Will this be an internal assessment or hire an external for it?

Division of Forestry staff

953. Investing resources to develop a specific strategic plan in outreach and education. This item also has linkage to the FH and UF sections. There is concern spread here that there is a defined strategic direction for the DOF for the next 5 or so years, and then reference here yet, where another more detailed one needs to be done for two more years. This certainly projects as waste and low value item. This certainly appears to be yet another step in the non decision making process. (CP-4) could be more specific in identifying roles for UWEX basin educators and their value also.

Division of Forestry staff.

954. Public education and outreach deserves a high priority, and is necessary in union with partnership efforts – that one only works well with the other in place and this is true for all programs. Commitment to WDNR's mission to protect and sustainably manage resources should emphasize, not just assume, commitment to education and outreach (also applies to UF 5).

For all operations, maintain person-to-person contacts whenever possible, even along with electronic communications. Be a visible neighbor and partner. Not enough can be said about the value of friendly, personal, verbal or face-to face contacts with members of the public. It gives DNR a face and the human element that is needed in maintaining service and partnerships. Developing partnerships in all areas builds and maintains good neighbor-to-neighbor relationships, and recognition of the value of public service, to our citizens and neighbors.

Division of Forestry staff

955. Agree. Already addressed this with my comments in UF-5.

Division of Forestry staff

956. My understanding is that the idea for an assessment was born out of a realization that nearly every program in the division of forestry has some sort of outreach or education component, or both. The assessment was suggested as a way to:

1. get clarity on the outreach and education efforts of the division
2. assess whether or not it is possible to have more coordination among current outreach and education efforts
3. assess whether or not there are efficiencies that can be gained through such coordination and
4. assess whether or not there are any other benefits to programs from such coordination

My comments are based on the understanding above, with full recognition that it may or may not be accurate (there really was no detail in the draft strategic plan about this so this is all interpretation, handed down several times).

I feel that a division-wide education and outreach assessment could be beneficial for many reasons. First, on a more top-level I feel it shows, as does the strategic planning work, that the division is "taking a look" and evaluating what works and what doesn't, what job we do and if that meets our mission, as well as the quality of the job we do. Current transitions in state leadership make this an especially important activity to be doing and showcasing now, but even with that aside, its just a good idea for doing our business well and serving the state well.

Second, I think there are many improvements that could be made in the division with regard to education and outreach. Exploring where our limitations, needs, strengths, and skills are can help foster those improvements.

Third, there are probably areas we'll find to save money and staff time, which is helpful to any program.

Overall, I support the assessment. I also think there are many more ways to implement an assessment that leads us in the wrong direction than there are well-designed and implemented assessments. Education and outreach in the division is NOT easy to wrap our heads and even our actions around and the complexity must be taken into consideration and recognized in order to plan a worthy assessment. The two-year time frame for the assessment shows that there is some understanding of the complexity and that answers will not necessarily come easily and obviously.

Foremost in my mind since reading the draft strategic plan has been the question: "Who will be involved in the division wide outreach and education assessment?" This question applies in terms of preparation and creation of a plan to assess, feedback and information sharing for the assessment, and interpretation and strategy building after the assessment. In my opinion, in all of these phases, we need education and outreach staff from the division and potentially from outside of the division, closely involved. I cannot imagine providing my input via survey or having it come from my position description or being able to fully understand others' input if it is gathered that way. So very much of education and outreach is done "behind the scenes," embedded in relationships with other program staff, keen knowledge of program topics and issues, sensitivity to stakeholders opinions, investments, concerns, and support, and so much more. These details could be easily lost in any phase of an assessment process. High-level, big picture thinking and every-day, in the field and on the ground experience must play an equal role in assessing the immeasurable and invaluable work and services of education and outreach in DNR forestry.

If FLT and FOT agree and plan to involve education and outreach staff in this endeavor as we move forward, please know I would be happy and honored to participate. I've already started gathering thoughts from the forest health program as to what they would want communicated on their behalf with regard to an assessment of education and outreach division wide.

Division of Forestry staff

957. While this is desirable, one should not forget in this process that the local DNR forestry person is the key person supplying most of the forestry information in their area.

Division of Forestry staff

958. I am all for this, and wildlife is talking about doing the same thing. I really wonder if there is an opportunity for us to combine efforts and work on a joint outreach and education plan for all of our natural resources. Just a thought.

DNR staff (non-Forestry)

959. 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. Comments: This is an important effort especially as it relates to private forestry and being able to identify the relationship we have with partners on these efforts.

Division of Forestry staff

960. I feel this is an area to look into trying to reach the private landowners that are currently not receiving any professional forestry assistance and advice.

Division of Forestry staff

961. The BWM understands the need for an outreach and education assessment as we have embarked on a similar process with a statewide educational plan for wildlife management. We'd encourage collaboration with Mary Kay Salwey and her team as there are a number of areas where our outreach and education strategies could be collaborative.

DNR staff (non-Forestry)

PUBLIC COMMENTS

962. This draft proposal is difficult to comment on since it asking to accept the outcome on a planning process that hasn't started yet. It is unknown what that outcome might be. There are already large ongoing investments in projects such as the Milwaukee Forest Awareness center, UWEX Basin Educator program, LEAF at UW-Stevens Point, PLT, State Fair, and other programs. This proposal seems to be deflecting or shielding those projects from scrutiny of an independent examination of the effectiveness of these ongoing investments have on citizen forestry awareness.

M. Luedeke

963. Agree. These kinds of endeavors need careful analysis to ensure that the money spent does produce positive results. An easy place to do what you've done in the past without analysis.

N. Paulson

964. We question how CP-4 can be accomplished with staff vacancies and tight state budgets and believe that would not be a good investment in additional resources but rather focus the shift of those resources to external partners.

L Hanson, WWOA,

965. Obviously, I would like to see more emphasis on education and outreach. The Strategic Direction doesn't really provide any commitment at this point – just indicating further assessment will be done. Education and outreach is another high leverage point with long-term impacts (unfortunately the short-term impacts are harder to see/measure). I believe the Division's general direction to partner on education and outreach is good. I hope those partnerships will be continued. We look forward to participating in any further assessment on education and outreach involvement.

J. Solin, UWSP

966. We support CP-4 and hope to be involved in this process as a valued partner.

J. Severt, Wisconsin County Forests Association

CP-5

Hiring & Training

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)
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DNR STAFF COMMENTS

967. What about continuing ed/providing options for current employees? I think the corporate culture survey shows that employee development has been a problem. Leadership academy is not longer about leadership I'm told so that provides development for a very limited number of employees but what about the rest of us? Continuing education helps with job satisfaction.

Division of Forestry staff

968. There seems to be an overall theme that division employees will become less hands on managers and more facilitative in their work as we hand off more and more duties to consultants, industry partners, etc. I not opposed to working with our partners to get our work done and in fact we could not possibly accomplish many of our management goals without the support of external partners. My concern here is that we must figure out a way for our forestry staff to maintain and continuously update their field level forestry skills to be effective and respected facilitators that oversee the many facets of our program. A common theme from our meetings was "we must maintain our boots on the ground-on the job experience to be effective leaders in forestry". As we lose much of our experience through retirements this concern becomes even greater. A suggestion is that through training and real on the job experience we constantly evaluate ourselves and maintain our field level proficiencies as we grow in our careers.

There is a strong understanding that diversity in our forestry job duties is critical to our survival. As I talked with my area staff they agreed with this concept but pointed out that we must avoid becoming "a Jack of all trades and a master of none". The suggestion is that diversity is critical to our survival but it should be met through the division as a whole and not by each individual employee. We must direct our employees to engage in a limited number of tasks that will allow them to become experts in those tasks and will allow them to reach substantial, timely goals vs. constantly re-tooling for a different task and never getting much done. I believe that this would lead to a better work product and higher employee satisfaction.

Division of Forestry staff

969. My first issue deals with accountability and production of forestry positions. I believe we need to take a hard look at this statewide and redo pd's and distribute the workload. It is incredible the disparity amongst positions. Many positions are responsible for a wide variety of programs (fire, private, state lands, county etc.) while others simply deal with one. People need to be moved around if the workload is greater in one area versus another or the position needs to be redone to effectively account for that workload. We have some positions that are useless. I suspect that is supervisory in nature, however, the work is still there.

To get the best bang for the buck: be accountable/production oriented, keep our integrity/credibility intact by being field savvy.

Division of Forestry staff

970. As I mentioned at the meeting, a primary concern of mine is that this direction does NOT address a key issue in attaining greater production, that being our poor accountability. ... A primary supervisory duty is to ensure individual productivity/accountability. That is not being done. I know it sounds harsh but I believe we are missing the boat on this. ... We need to make all employees step up to the bar or they are gone, plain and simple. You produce x or we'll find someone else who can. In addition, I was told that we are encouraged to share personnel around the state to get things done. In my experience that has actually been discouraged. We mobilize personnel instantly for fire. We do none of this for forestry. This, of course, is tied into the above. ... The bottom line is this: If we used the supervisory system to get everyone producing to their maximum capability and also shifted personnel around to attack shortfalls, a HUGE benefit would be derived. ... Finally, I think that the strategic direction is only a paper exercise unless real effects are demanded and applied. No, "We want everyone to try to do these things". Cut the dead-weight, get on the \$#@ snowshoes, and get to work.

Division of Forestry staff

971. Supported.

Division of Forestry staff

972. Agree. Recommend adding a commitment to "retain" quality employees once we hire and train them. Need to focus additional emphasis on quality and consistency of our forestry leadership. Please reconsider your previous

elimination of the forestry training officer position. We need to have an individual in this capacity that also has the technical skills and experience.

Division of Forestry staff

973. Throughout this document it appears that future DNR foresters will be enforcement and public information based, not "field foresters". I feel that it is a mistake to reduce or eliminate the opportunity (or better yet, requirement) for foresters and technicians to do traditional, on the ground, forestry work. By doing so, the adaptability of class room ideas to real world situations is lost. Also, personnel do not gain an appreciation and comfort working with the resource they are supposed to be promoting. This will show most when these foresters need to interact with consultants and knowledgeable landowners and fail to instill a sense of confidence.

Division of Forestry staff

974. Totally agree, including the recent forest technician hiring process. Finally, don't know where to put this, but CP-5 looks about the best place: It is time for the Division to take a serious look at combining the job duties of foresters and technicians for some of our positions. We frequently talk about the need for our technicians to become "proficient at forest management duties", however I am convinced that we could hire, in certain places, professional foresters who operate a tractor-plow during fire season and then be available to provide professional level forest management work the rest of the year.

Division of Forestry staff

975. Hiring & Training CP-5- I agree, however let's not forget about the employees we already have. Employees truly are the most important resource our organization has. Hiring good employees is important, but it is also very important to support all employees who we already employ. Although it will not be easy during challenging times that may bring budget reductions, personal reductions and a change in the role we play in the larger forestry picture it is imperative that we place the emotional and physical health of our employees at the top of our priority list. Forestry employees typically enjoy their job, appreciate the flexibility and diversity of their positions and relish the challenges that a forestry position with the State of Wisconsin offers. Additional sharing of information from the AFL position down through the field ranks may be required during this period of change. In addition, now is the time to implement programs that will assist employees in coping with the change they will face during the next several budget cycles.

Division of Forestry staff

976. Accountability, ownership, good work ethic, good communication skills, flexibility in work assignments are all essential characteristics that need to be considered when hiring quality employees. During the hiring process there also needs to be discussion of what will be the disciplinary action if these characteristics are not adhered too. It seems like the department is weak or does not stand on its own feet when it comes to disciplinary action brought on employees.

Division of Forestry staff

977. Employees hired need to be flexible and have good communication skills. There needs to be more accountability of employees. It seems that people can get away with a lot of things without being penalized in any way.

Division of Forestry staff

978. We need to continue to have training programs as advanced as the new employee training program. I was a part of it and it was a great experience and I learned a lot. I know the circumstances of the most recent hiring class was different than what is typical but I feel that the high level of training done in the past should be developed and given to this new class of foresters and techs, and to classes in the future. This is another area to bring up the ability to coordinate the training opportunities that can be utilized in the resurrection of WIFC when talking about fire training.

Division of Forestry staff

PUBLIC COMMENTS

979. Strongly agree with ongoing efforts to hire quality employees with a range of interests and experiences.

M. Luedeke

980. Agree.

N. Paulson

981. WWOA concurs in CP-5 and believes that the emphasis on CP-6 should be at the state level.
L Hanson, WWOA,

CP-6

Cross Program Policy Analysis

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)

DNR STAFF COMMENTS

982. Increase investment in policy analysis. There is some thought that instead of investing here, the DOF should employ an appropriate decision making model rather than studying an issue to extinction or “shelving it”. The biggest investment DOF needs is an ability to execute and implement a decision item. There is considerable time and effort spent in the evaluation phase. This could be met with a reallocation of program specialist s and skill sets if needed.

Division of Forestry staff

983. Agree. However, be careful to not let the latest fad steer the boat.

Division of Forestry staff

984. CP-6, CP-7-Okay.

Division of Forestry staff

985. Analyzing policy is an important area and I feel that input from the field employees needs to be utilized as much as possible before new ideas are brought to fruition in policy changes.

Division of Forestry staff

986. Forestry here intends to increase its investment in policy analysis on such issues as biomass, deer management, transportation and climate change adaptation. We support this effort, and are anxious to learn more about how this increased policy analysis will be accomplished and who will contribute.

DNR staff (non-Forestry)

PUBLIC COMMENTS

987. Don’t agree with increasing investment in additional policy and analysis efforts until better information is provided on where the resources for this increase are taken from.

M. Luedeke

988. Agree if you add wood production to the list.

N. Paulson

CP-7

Forest Certification

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)

DNR STAFF COMMENTS

989. One comment on the proposal to continue our investment in forest certification: Have we undertaken a detailed cost vs. benefit analysis of certification? If so, it doesn't seem to have been very transparent - I've not seen what the actual costs are to the Division. Understandably, there could be a lag in seeing the marketing value of certified wood, so maybe there is a difficulty in pinpointing actual benefit at the front end. I feel like being cautious because I think the state has gotten in trouble with "middle man" programs such as ARI for our fleet vehicles - like the health care system when you don't see a bill for medical expenses. My hope is that we are not investing in certification at a huge financial and staff time expense just because it is the trend these days. There is the option to just stand by our management and to be able to point to our methods and open reporting and numbers, and say "Our wood is sustainably managed, take a look and see" - without needing someone else to say that we are doing a good job. At the least, I hope we have closely looked at the cost/benefit and it would probably be good to make that available to Forestry Division staff in a document.

Division of Forestry staff

990. I would also strongly suggest we dump dual certification and choose the one that provides the biggest bang for our buck (Currently FSC). Paying for the added redundancy of dual certification does not make much sense. If one user needs SFI certified wood I suggest they kick in some money.

Division of Forestry staff

991. Support for certification, however there should be increased investment in the maintenance and training for the implementation and long term monitoring. To fully subscribe to a Continuous Quality improvement program, resources need to be continually invested to get the improvement and maintain it.

Division of Forestry staff

992. Agree - Although many question its merits and it can be a pain in the neck -- it is something that the Division has taken on that significantly improves the WI forest products industry's success.

Division of Forestry staff

993. The Division remains committed to its investment in third-party certification of state lands, county forests and the Managed Forest Law. Comments: Is our commitment only to state lands, county forests and MFL lands? With the experience and background that we have in certification I believe we should include a commitment to third-party certification on other private lands. Not as a program manager but in a role that includes supporting and/or facilitating other partners to develop/seek/acquire third party certification. We create and maintain many programs and guidelines that can be used by or support others in their goal to be certified (e.g., state natural areas, the Wildlife Action Plan, NHI portal, and item as discussed in CP-1 and CP-2). Not to get into the "operational" side of this but two examples include supporting the State Tree Farm Committees group certification or a certification tool kit and how to guide.

Division of Forestry staff

994. I feel certification has been and will continue to be a good stroke of business.

Division of Forestry staff

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

DNR staff (non-Forestry)

996. Disagree. Third party certification has also been a moving target, hard to pin down, difficult to explain and even harder to demonstrate what the competitive advantage has been. It has come at a high cost and should be reconsidered. Perhaps we should create our own certification program.

Division of Forestry staff

PUBLIC COMMENTS

997. Agree with the proposal to continue participation in forest certification on public and private lands in Wisconsin. May be prudent to periodically evaluate the need for dual certification on state and county forest lands. Currently, this

requires some duplication of both staff and field personnel to maintain certification performance on two sets of criteria that have many common elements.

M. Luedeke

998. Agree.

N. Paulson

999. WWOA concurs with CP-7 but believes it is time with investment to engage dialog on Non-MFL, lands owned by private forest landowners. That makes up the bulk of forestland not under any kind of forest certification.

L Hanson, WWOA,

1000. [Supported by the Paper Council] The second is in the Forest Certification section, where the Division of Forestry states its commitment to its investment in third-party certification of state lands, county forests and the Managed Forest Land program (CP-7).

E. Gustafson, Wis. Paper Council

1001. Although forest certification is not a specific category in the Strategic Direction document, it certainly is an issue with many of the categories.

I originally had a lot of reservations about the whole forest certification program, but I think that time has proven it to be worthwhile, for a wide variety of reasons. However, it is not a perfect program and the weakness that I will describe could very well lead to a decrease in its effectiveness, or even its demise.

One of the ways that I have earned some money for fishing equipment and various outdoor expeditions is doing Master Logger field certification audits for the Wisconsin and Minnesota Master Logger Programs. During the past 4 years I have had an opportunity to spend time with over 50 different logging companies at locations varying from Oconto Co., Wisconsin to Black Duck, Minnesota. In virtually all of these audits, the logger's made some comment (sometimes quite a lot of comment) about the forest certification programs that they were dealing with.

Most of the loggers felt that there was at least some value to forest certification, but most of them in both states also added that there are always are opportunities to circumvent the certification process. Their concern was that the avenues for getting around certification give the loggers that take advantage of those opportunities an unfair advantage over the loggers that comply with the system.

I certainly am not naive enough to think that there will ever be a way to stop all abuse of the forest certification process, but keeping the level of abuse as low as possible will be extremely important for keeping the level of credibility, for certification, as high as possible. An important goal for the Division of Forestry should be to work with the forest products industry to assure as much accountability and transparency in that process as possible.

T. Salzmann, Sandhill Land Services, LLC

CP-8

Energy Efficiency

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

1002. Under Cross-Program Activities and Energy Efficiency, we should include verbiage to include future construction projects being as energy efficient as possible. It currently only discusses doing energy audits and remodels for current buildings.

Division of Forestry staff

1003. Still driving "Big Green", the enormous 5-acre turning radius Dodge Ram at 10 mpg. Been begging for a small truck for years to save fuel and cost. Laughable, really.

Division of Forestry staff

1004. Get rid of the big 4x4's to a more economical 4x4.

Division of Forestry staff

1005. We are the DNR - let's walk the talk.

Division of Forestry staff

1006. Investment in energy technologies is a golden opportunity for WDNR to demonstrate commitment and leadership in stewardship.

Division of Forestry staff

1007. I am not sure what energy is limited to? If it is only electricity, then I am fine with the change, but if it encompasses all energy, including fuel, I think there needs to be an emphasis on vehicle usage. I hear all the time that "If I don't put X number of miles on my truck, I will lose it." I am not a field staff person, but this sounds like people are forced to drive to add miles to cars which is completely irresponsible of us as the DNR.

Division of Forestry staff

1008. Agree. This is already being done in NER. Additionally, the increased investment needs to be made to implement the findings of such energy audits at the individual property or station level.

Division of Forestry staff

1009. My particular interest is in regards to CP-8. I am happy to see that the division recognizes the importance of energy efficiency. The long term gain of energy efficiency will far outweigh the short term pain. Investing as much as possible today will help to offset the increasing strain on budgets that a 6% average annual increase in energy cost will have. As energy efficiency is incorporated into our facilities there will be less "energy strain" on program budgets and more resources available to do the most important work.

Division of Forestry staff

1010. Opportunities for investments in this area are common. However, some innovative ideas have in the past been rejected by local lands personnel so buy in by them is needed as well.

Division of Forestry staff

1011. I agree, however we should take the same approach when it comes to vehicle purchase. Let's analyze the available data to determine whether it makes sense to purchase electric vehicles and/or fuel efficient vehicles. Our service center recently picked up a mini van (brand new) that gets 17 mpg. Although the mileage rate is relatively low, 0.25/mile, a more fuel efficient alternative may have been a better choice. I can't say that, but there must be research out there somewhere that paints an accurate picture. As fuel prices rise and our concern about carbon footprint increases the state needs to become a leader when considering travel options. Are there opportunities to utilize existing research from our University system to provide us with statistics on how best to become a leader in green technology when it comes to vehicles and buildings? If so, let's use that knowledge and make wise choices. The taxpaying public expects us to be leaders when it comes to environmental issues, let's live up to that expectation.

Division of Forestry staff

1012. Incentives should be issued to employees that do or come up with ideas to save energy. Even if it is something as simple as recognition for doing a swell job.

Division of Forestry staff

1013. Great idea for transparency and to set the DNR as a model to other organizations to follow.

Division of Forestry staff

1014. Applaud the effort to create more energy efficient facilities, hope that this includes engineering and design of new facilities. I also hope money is available upfront for technology/ efficiency that offers reasonable payback or break-even costs.

Division of Forestry staff

PUBLIC COMMENTS

1015. Strongly agree with need to conduct energy audit on existing facilities and simultaneously give equal emphasis to over ride outdated building design and construction bidding practices imposed by WDOA. Standardize design to reduce design costs and invest savings in better green building features.

M. Luedeke

1016. Recommend this be expanded to include an analysis of the need for all of the facilities you have. The big program to build the large offices was to consolidate people and close facilities for efficiency and to improve public service. Neither of these has been accomplished. It still needs attention.

N. Paulson

1017. CP-8 just makes good sense as does CP-9.

L Hanson, WWOA,

CP-9

Assistance to other Divisions

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

DNR STAFF COMMENTS

1018. Agree -this is essential.

Division of Forestry staff

1019. Disagree. Over the past 30 years, I've witnessed the level of assistance provided to other DNR programs drastically reduced, not maintained at any level. Likewise, forestry receives less assistance from others. Unfortunately, this is often a result of heavy workload, increased program complexity and time constraints. Gone are the days when you rub my back and I rub yours. That's unfortunate. We should explore ways to increase this service, not simply maintain what's eroded over the years.

You could include research scientists in your mention of expertise from other divisions.

DNR staff (non-Forestry)

1020. Assistance to other Divisions-Agree 100%. Being involved with other functions not only makes us better at what we do but it makes our jobs more diverse and enjoyable!

In summary, there is no doubt that significant change will be occurring over the next several years. I am happy to see that Paul continues to be the Chief State Forester and will lead us in a positive direction. Financially employees will probably take a step backwards which may cause some apprehension. Supporting employees during these challenging times will be important! I don't believe employees of the Division of Forestry are afraid of change, as long as the change results in maintaining effective and efficient programs. Field employees also want to continue to be hands on employees, not

simply overseers! Those of us with enough tenure have lived through “change for the sake of change” with less than desirable results in some cases and an eventual return to better options. Strategic direction planning will help define our role and is a good starting point. As the operational aspect of implementing strategic direction comes into play it will be important to maintain open communications with all staff. At a minimum consider the recommendations and feedback field staff will provide. Based on history, field staff will clearly rise to the challenge.

I heard numerous comments about the importance of communication and relationships between supervisors and field staff during our strategic planning session. No one wants to take a step backwards, but perhaps having a team leader that supervises less people across a smaller geographic area and has field responsibilities defined (oh no, the WUS again!) might be something to consider. In the long run that probably means several additional “team leader types” but it could be more efficient and effective as travel costs increase and change continues to be the norm. That’s probably an operationally item, so just a thought.

Division of Forestry staff

1021. This program and idea is listed to be maintained, but I don't feel it has been effective recently. I have seen mixed messages across the programs and we're not always on the same page when we should ultimately be. I think that it can be done but compromise is needed across the board and all programs are at fault in some way from what I've experienced. Continued work toward the mission should be done with collaboration and better communication of the varying ideas and opinions out there.

Division of Forestry staff

1022. The BWM would like to acknowledge the value of CP-9 and expresses its support for continuing these partnerships. There are many examples of positive working relationships at the field and regional level that have had tremendous impacts on Wisconsin’s forest resource and the wildlife and recreational opportunities associated with that resource.

DNR staff (non-Forestry)

1023. Of course, BER acknowledges the long-term partnership with the division and the things that we have been able to accomplish together. For example, biotic inventory and subsequent master planning efforts on state forests have set the standard used throughout the department, and joint efforts focused on invasive species have been very productive. We are encouraged by statement CP-9 that the division plans to maintain assistance to other programs and to maintain important partnerships.

DNR staff (non-Forestry)

PUBLIC COMMENTS

1024. Agree.

N. Paulson

1025. Agree.

M. Luedeke

1026. CP-9 is a necessary part of the Division of Forestry Program. However, we would become concerned if maintaining the current level of assistance to other DNR programs led to a decrease in resources for other programs and partnership such as the county forests. We too rely on expertise from WDNR wildlife biologists and water resource specialists and have an appreciation for their services but with the current high vacancy rate within the Division of Forestry we would not want to see services to partner programs further diminished due to the maintenance of current levels of assistance to other divisions within WDNR.

J. Severt, Wisconsin County Forests Association