



# Wisconsin Woodland Owners Association, Inc.

P.O. Box 285, Stevens Point, WI 54481-0285

[www.wisconsinwoodlands.org](http://www.wisconsinwoodlands.org)



March 31, 2016

Allison Hellman  
WI DNR  
Madison, WI  
[allison.hellman@wisconsin.gov](mailto:allison.hellman@wisconsin.gov)

Dear Allison,

The Wisconsin Woodland Owners Association (WVOA) thanks you for the opportunity to review the DNR and Division of Forestry's draft alignment proposals. WVOA, representing the 350,000 plus private woodland owners covering more than 11 million acres in Wisconsin, values the unique and important role the Division of Forestry plays in assisting Wisconsin's private woodland owners in sustainably managing their woodlands.

WVOA believes that DNR's core functions include forestry, parks, water quality, and wildlife management. We support DNR resources being allocated to these functions. DNR has an important role in the protection and management of our state's natural resources. This is never more evident than as we watch the events unfold in Flint, Michigan, the wells in Kewaunee County, and the rampant spread of Chronic Wasting Disease in white-tailed deer populations.

WVOA's comments are consistent with the Department's goals of increasing accountability, increasing efficiency, improving workload management, consistency and collaboration, and maximizing outcomes. Our comments focus on core functions that leverage staff expertise, the Division's niche, and improve service delivery. However, some proposals were so broad that WVOA could not comment on them because no details were provided to help us better understand what was being proposed, how it might change existing programs, what might be gained by the proposal, or how it would be implemented. WVOA hopes there will be additional opportunities for input as these proposals are expounded upon.

The WVOA Board of Director members take these issues very seriously such that they devoted significant time to review and prepare responses, which we know are lengthy, but justified due magnitude and volume of changes proposed. We are hopeful the DNR, as our partner, will thoroughly review our concerns, contact us for clarification if needed, and consider adjusting accordingly such that we can both continue to support Wisconsin's private woodland owners in sustainably managing their forest resources.

Our comments follow the **Summary of DNR Core Work Analysis Results** document.

## Priority #1

### Create a Cohesive Approach to Non-game and Rare Species Management

WVOA supports this concept however we have several questions. How is this different from what you are doing now and what are you going to do differently? Will this enhance services to private woodland owners or reduce services?

#### WVOA OFFICE EXECUTIVE DIRECTOR

Nancy C. Bozek  
P.O. Box 285  
Stevens Point, WI 54481  
715-346-4798  
[wwoa@uwsp.edu](mailto:wwoa@uwsp.edu)

#### WVOA OFFICERS BOARD OF DIRECTORS 2015-2016

##### PRESIDENT

Paul Kienitz  
500 S. Center Avenue  
Merrill, WI 54452  
715-536-6823  
[paul.kienitz@riversideathletic.com](mailto:paul.kienitz@riversideathletic.com)

##### VICE PRESIDENT

Steven J. Ring  
W7004 Detention Rd.  
Shiocton, WI 54170  
920-735-9702  
[sring@utilityssi.com](mailto:sring@utilityssi.com)

##### SECRETARY

Mike Bohman  
N8109 Wolf River Dr.  
Algoma, WI 54201  
920-487-3197  
[michaelfbohman@hotmail.com](mailto:michaelfbohman@hotmail.com)

##### TREASURER

Arlene Roehl  
159 Lakeview Ave.  
Long Lake, MN 55356  
952-473-3036  
[arcompliance@bigplanet.com](mailto:arcompliance@bigplanet.com)

##### DIRECTORS

David Congos  
N51562 Harriman Rd.  
Osseo, WI 54758  
715-597-2272  
[dcongos49@gmail.com](mailto:dcongos49@gmail.com)

Jack Kucksdorf  
W4415 Park Square S.  
Random Lake, WI 53075  
262-689-0602  
[kucks4@execpc.com](mailto:kucks4@execpc.com)

Margaret H. Parsons  
1861 Ridge Road  
Junction City, WI 54443  
715-457-2470  
[mparsons@tds.net](mailto:mparsons@tds.net)

Steven Raether  
4530 CTH K  
Chippewa Falls, WI 54729  
715-723-9736  
[raetherrees@gmail.com](mailto:raetherrees@gmail.com)

Charles R. Wagner  
E1934 Cty. Rd. S  
Luxemburg, WI 54217  
920-837-7712  
[wagnerc50@yahoo.com](mailto:wagnerc50@yahoo.com)

Richard Wagner  
E5861 Clark St.  
Weyauwega, WI 54983  
715-281-7032  
[richardwagner@centurytel.net](mailto:richardwagner@centurytel.net)

Randy Williams  
N1896 Cozy Lane  
Antigo, WI 54409  
715-623-5660  
[willir2456@gmail.com](mailto:willir2456@gmail.com)

## **Priority #2**

### **Genetics Work Associated With the Tree Improvement Program**

WVOA is aware that state nursery seedling orders have declined to approximately 3 million per year. We feel some of this decline can be attributed to the downturn in the economy, current Wisconsin property tax policies, lack of available cost sharing, and lack of promotion of tree planting by foresters.

If DNR is going to dismantle the Tree Improvement Program, then WVOA encourages DNR or UW-Madison Department of Forest and Wildlife Ecology to make a commitment to continue to provide technical transfer of improvements/knowledge gained to the state's private nurseries perhaps by creating a co-op program.

WVOA questions where the time savings from no longer assisting landowners with tree planting has been reallocated? This significant decline in tree planting would have resulted in time for DNR's higher priority work such as engaging the unengaged landowners.

### **Evaluate Printed Communications and Involvement in Promotional Events**

WVOA supports a review of communications and promotional events. WVOA appreciates and uses many of the printed materials provided by the Division of Forestry. Private woodland owners, in general, are not as computer literate as younger audiences and many still prefer to receive their information in hard copy form. In addition, we hope the DNR will recognize that internet accessibility is still very limited in many rural areas of Wisconsin and take this into consideration when determining which documents to print versus offering online.

## **Priority #4**

### **Prioritization of Land Management Services**

DNR has noted that they will "be analyzing its relative investments in private versus public lands." WVOA hopes that prioritization of services will be based on the percentage of private vs. public forest acres and the volume harvested off of these properties respectively. Will this analysis lead to more or less of a commitment to the small private landowner and why?

### **Changes to Managed Forest Tax Law and Private Forest Lands Assistance**

The Division of Forestry has spent many years trying to re-organize and streamline the Managed Forest Law (MFL) program to no avail. WVOA feels this constant state of flux is not productive and makes the program more confusing to Division of Forestry staff, Cooperating Foresters, participating MFL landowners, those considering enrolling, and other forest industry professionals.

The Division has stated for the past 5-10 years that private forestry is a high priority yet over and over again these programs are cut, staff is shifted to other work duties, and landowners are left waiting months for assistance. While new programs are started or existing programs have additional resources redirected to them, private forestry languishes.

WVOA requests that DNR demonstrate that the private forestry program is a higher priority through increased staff and resources. Reducing time commitment to the private forestry program, which oversees more than 60% of the commercial forest land in Wisconsin and the land most at risk of abuse, is especially hard to accept

when DNR is taking on additional responsibilities on Federal land, writing DMAP plans, and in assisting other functions with prescribed burning.

An engaged, proficient forester at the DNR station will do more to promote forestry than another plan to redefine your organization. Less meetings and paper work – more time with woodland owners.

There is a need to flatten the Division of Forestry organization in order to provide more available front-line delivery of service, i.e. foresters in the field. Defining expectations of staff and monitoring performance will go far in servicing MFL landowners and engage the unengaged if work objectives are properly identified. Look to what has worked in the past rather than trying to redefine what might work.

Working with external partners is important, but DNR occupies a unique role and as such has been charged with oversight of their programs. The thought that DNR administration is maintaining that DNR foresters should not advocate for forestry defies the definition of a professional. WWOA expects that DNR foresters take the lead on promoting and advocating for sustainable forestry and we challenge those who feel the DNR forester's role is to remain policy neutral.

The Division of Forestry appears to be ignoring Wisconsin's forestry history, setting us up for a repeat of the turn of the century. The forest tax laws were created in response to the unsustainable management of our state's natural resources. The forest tax laws have always included more than just a tax break for private woodland owners.

When the MFL program was created in 1985, DNR foresters worked with landowners to help identify their management goals, wrote their management plans, marked their timber and assisted in putting it out for bid. These "touches" helped to create a trusting relationship. DNR foresters provided guidance, technical assistance, and encouragement to private woodlands owners. These MFL landowners subsequently became advocates for sustainable forestry among their family/friends/fellow woodland owners and ambassadors for DNR foresters. (Sound familiar? Perhaps like a recent initiative which has a much larger price tag?)

However in subsequent years, most of these services to landowners have been eliminated, so much so, that most MFL landowners feel abandoned by DNR once they sign their MFL contract. During this time, the costs for landowners to participate in this "incentive" program have risen significantly – hiring a certified plan writer, increased enrollment fees and closed acre fees, hiring a Cooperating Forester for management practices, and complying with a variety of Best Management Practices.

With the implementation of Use Value Assessment and the decline in technical assistance provided by DNR foresters, it is no wonder that many view the MFL program as "just a tax break." The educational and technical assistance, clearly a niche for DNR foresters, has been eliminated. As a result the Division of Forestry has lost its advocates and ambassadors that brought the "unengaged" right to the field forester's door. WWOA does not know how the Division defines the "unengaged". Based on our experiences, the majority of current (especially recent) MFL landowners are the "unengaged" and they are right on the DNR's door step waiting for you to

open the door. Perhaps DNR foresters could ask MFL participants to reach out to their family/friends/neighbors and the forester could do a walk on the MFL property to engage these landowners in a conversation on sustainable forestry? In addition, many MFL landowners who are coming to the end of their 25 year contracts are very torn between continuing in the MFL program and walking away from what has been a disappointing experience. Is this group now, by definition, unengaged?

The Cooperating Forester program was created by DNR to provide a cadre of private consulting and industrial foresters that voluntarily agree to abide by DNR approved sound forestry standards in all forest management guidance and assistance they provide to private woodland owners and to augment DNR technical services as the complexity of the MFL program increased.

Unfortunately, the Division of Forestry has not provided adequate oversight of the program by setting standards, annual auditing of participants' performance both on MFL and nonMFL lands, and public reporting on the program. Landowner reports of abuses include contracts that are never fulfilled, differences in timber marking whether the land is enrolled in MFL or not, lack of timber harvesting administration, and listings of industrial foresters as private consultants. The lax oversight and transparency of the program has done nothing to create trust in MFL participants. Landowners are frequently referred to WWOA to help them "weed through" the list to select reputable foresters.

WWOA agrees that practicing sustainable forestry is a partnership. However, the landowner is the only one who is held liable when sustainable forestry doesn't occur. Timber harvesting is an arena where the buyer is usually more educated than the seller about the value of their product and how to manage it sustainably. This is where DNR's niche is – as the disinterested third party with the ability to administer and review proposed management practices through cutting notices and determine if they meet the DNR's silviculture guidance. This is where sustainable forestry happens and DNR needs to follow through at this critical juncture.

When the MFL program was created DNR said, "I do", but now DNR continues to look for ways to separate from the marriage. To have a successful MFL program, it takes effort by all parties or it will eventually fail. In WWOA's opinion, the MFL program is failing under the weight of many years of the lack of proper program administration by the Division of Forestry, resulting in the Division becoming the weak link in its success.

**Decreased Investment in MFL & Increased Investment in Private Forestry (nonMFL) document comments:**

WWOA questions two of the three assumptions made by the Division of Forestry on page 1 of this document. It appears the Division is just shifting their MFL administrative duties onto others who are less informed about the MFL program. The second expectation states "that landowners and the professionals that they work with understand the program requirements and will comply with program standards." What is the DNR currently doing to educate landowners and professionals about program requirements? What is DNR doing to assure more education in the future – how will DNR educate landowners and professionals about all the intricacies of the program? How will DNR keep all participants and professionals informed of the ever

changing requirements and details? There is no mention of who will do this, how it will be accomplished, or allocation of the resources needed.

WWOA also questions the third assumption that states “time savings from MFL administration is expected to be realized by proactively verifying mandatory practices prior to preparing mandatory practice lists, by relying on landowners to self-certify that their land meets program requirements when completing an application, and by auditing a percentage of the applications/maps/cutting notices instead of reviewing (and often field checking) every one that is submitted. Please note that if a landowner requests it, a cutting notice would still be reviewed in the office, and that review may or may not require a field visit. By completing verifications prior to generating mandatory practice lists, the expectation is that reviews of cutting notices should be easier and not require as many field visits.”

A specific time saving item for field foresters is to hold people accountable to follow DNR policy and the MFL plan. It has been shown consistently that the same bad actors refuse to play by the rules and are continually challenging the local forester. This causes DNR forester after DNR forester (and their supervisors and other Division staff) to spend inordinate amounts of time meeting with, explaining, following up, and documenting violations that often recur. Generally this is not a “can’t do” scenario – rather it is a “won’t do” situation. DNR is charged with administering the rules. The Cooperators are charged with playing by them.

Verifying mandatory practices prior to generating the landowner mandatory practice letters and lists for professionals will hopefully save some time for all partners. However, it should be noted that this is a solution to a problem that was created when DNR stopped writing management plans and mass contracted out the writing of management plans. These plans were not properly reviewed by the Division when submitted to make sure they accurately reflected the landowner’s goals and existing forest conditions. As a result, much time is now wasted on checking plans that don’t match site conditions.

In addition, it must be expected that stand conditions, landowner objectives, harvesting technology, wood markets, and silviculture will change over a 25 – 50 year period. Verification of scheduled harvests, without ensuring the landowner understands the cutting prescription or is fully informed of all the silvicultural alternatives, will simply serve as a procurement forester function.

We do not see the suggested connection that by field checking mandatory practices, the Division will then save time on reviewing cutting notices. Since a management practice will not be delineated or marked at the time of the forester’s visit there is no assurance that the proposed harvest is marked correctly or the cutting notice information is in compliance with the MFL program.

In about 2004, DNR made the shift from site specific management plans to “canned” management plans stating that the mandatory practices details would be moved to the cutting notices. Now most cutting notices don’t even need DNR review or approval. It appears that DNR administration and review to ensure compliance with the MFL program no longer exists. We question how this will impact continued FSC and ATFS certification of these lands? WWOA expresses our concern that lack of

DNR's administration of this program is putting thousands of private woodland acres at risk of no longer complying with the MFL program and sustainable forestry.

If the landowner requests Division review of the cutting notice then the Division should not have the option of whether or not to review the practice in the field – they must review the proposed harvest. If the Division reviews and signs off on the practice and it is applied in the field as described on the cutting notice then the landowner should not be at risk of being out of compliance with the MFL program.

**Questions to Consider – MFL Concept:**

**1. What do you see as the pros and cons of this proposal?**

**Pros –**

May include more field time spent with “unengaged” private landowners. Pros include verifying mandatory practices and confirming NHI hits – but what is being verified? Landowner goals? The prescription in the MFL plan and does it comply with the silviculture handbook for the cover type?

**Cons –**

WVWOA questions the math presented in this document. It appears that there will be a 35% decrease in time spent on MFL ( $25,500 + 23,750 + 16,000/2 = 57,250$  and compared to 88,000 average current status). How does decreasing MFL administration by 20% and reinvesting in non-MFL result in a 50% increase in investment (first paragraph under “Desired Outcome” on page 2)?

This proposal appears to just be shuffling duties on paper – taking time away from an existing legislated program and shifting time to the unengaged rather than increasing Division time allocated to private woodland owners as this group has become the largest forestland ownership category in the state. If this ownership group is a high priority as the Division states, then why are resources constantly being reallocated away from this program?

If this proposal is implemented as stated, DNR is forgetting its unique role in the MFL program. As landowners who have signed a 25 or 50 year contract, landowners have expectations of foresters, loggers and DNR, all vital professional links to a team to make sure landowners are practicing sustainable forestry and being good stewards of the land. DNR is not fulfilling its contract obligation.

It is unfair of DNR to enter into a MFL contract with a private landowner and change the rules in mid-stream. We signed our contracts under the premise that the DNR would provide program oversight and technical assistance. Now the Division seems to be abdicating on both counts and even more egregious, repeatedly stating the landowner has the ultimate responsibility even if review and approval is requested by the landowner. If DNR certifies a practice is acceptable and the practice is conducted according to the cutting notice there should be no further responsibility on the landowner's part. The idea of having landowners self-certify that their land meets MFL program requirements is actually scary, especially when the landowner is held solely responsible for applying sustainable forestry standards.

DNR continues to remove itself from its review/approval responsibilities on MFL lands and continues to transfer these duties to the private sector. As the DNR retreats, the private landowner is held fully responsible for the outcome of treatments on his/her

MFL entry and increasing financial risk. This is a net loss to the MFL landowner. As the Division continues to eliminate proper administration of the MFL program it is becoming harder for WWOA to advocate for this important and vital program.

**2. Does the distribution of workload make sense between the three work areas? Integrated field foresters? MFL forestry specialists? Are there concerns?**

WWOA does not support the creation of three work areas. The management and administration of the MFL program should be more integrated not less. Two work levels will be the most efficient and yet allow more foresters to stay in the field serving more people.

DNR hires foresters, it would be a shame to have them just sit behind a desk and shuffle papers and be an enforcement person handing out citations when they're not active in onsite operations. The field foresters should do most of the work along with assistance from private forestry specialists in Madison (which they are already doing) to tie everything together and handle the paperwork. Additional restrictions on field foresters will leave the landowner largely on their own and, taken to its worst case scenario, result in major loss of our forests.

We do not support pulling another 14 foresters out of the field as MFL forestry specialists to work on MFL applications and cutting notices – this will result in a net loss to private lands service.

The Division is encouraged to empower the field foresters to work with MFL applicants and to provide technical assistance to MFL participants by field verifying scheduled mandatory practices, completing NHI and archeological checks, and reviewing and approving cutting notices. This keeps the work at the local level using the expertise of the personnel most familiar with the local landowners and woodlands. This will prevent redundancies and uses each position to its full capacity.

Please define “supplementary audits” found in the last sentence under “Assumptions: MFL Forestry Specialists”. Why would the percentage of supplementary audits be determined by workload? If audits are conducted then they should be statistically sound, not random samples. Undefined and random auditing of the most crucial step of sustainable forestry management is not acceptable. DNR does not audit work currently being done by Cooperator Foresters. If an audit exception is found under this new initiative, what are the ramifications to the private landowner, Cooperating Forester, or other professionals that were part of the decision or implementation of the practice found in noncompliance?

**3. Are there issues that will need to be addressed if this proposal is implemented?**

The Division needs foresters in the field making contact with DNR's MFL contract holders. Taking 20% of the foresters out of the field and putting a lot of what is left at a desk in Madison is insanity. DNR field foresters need to keep on top of things. Audits should be conducted in the field by staff most familiar with the MFL entry, the landowner and the local factors most relevant to the situation, not administrators from Madison.

The field foresters will continue to be expected to do nonprivate forestry work including state lands, Good Neighbor Authority work, DMAP management plans and all the work the Specialists and Private Forestry Team can't resolve from the office. The perception is that once you sign your MFL contract DNR walks away from you to provide technical assistance to nonMFL landowners. The landowner is left feeling overwhelmed by the constantly changing and intricate program requirements but they are supposed to rely on nonDNR personnel to ensure they are meeting the program's requirements. In addition, the landowner assumes all risk while the nonDNR service provider assumes zero risk.

How will DNR assure private woodland owners that they can be comfortable that all bases have been covered prior to a harvest if they have no involvement in the sale? Liability - What happens to the cooperating forester, logger or mill if the program standard is not met? All burden falls on the shoulder of the private woodland owner, this should shift to all parties involved, if this is as the Division states, a true partnership to increase sustainable forestry.

We question why DNR administration is being shifted to the MFL landowner by relying on them to "self-certify". If you are truly transferring certification authority from the DNR to the private landowner, then any treatments that are deemed compliant with sound forestry by the landowner cannot be challenged by anyone at a later date. What is it you expect them to certify? It seems to imply that new MFL applicants will determine whether or not they meet the criteria to participate in the MFL program? If a person sells their land, what steps will the DNR take to make sure the new landowner can self certify? Is this not a DNR administrative role? Is this really making the program more efficient to administer or will this be the next hurdle in 10-15 years when the Division finds a glut of MFL parcels don't meet program criteria and then landowners are told they will be withdrawn from the program and be required to pay all the back taxes? Self-certification eliminates the need for DNR.

#### **4. Are there other ways we could achieve the desired outcome? How would those ideas be implemented?**

The desired outcome is not desirable in our view. We do not see a desirable outcome being proposed. To implement these ideas would not serve the people that need to be served.

WVWOA suggests reviewing policies that were efficient and worked in the 1970's, 1980's and 1990's on private lands and go back to them. During that time, the Division was successful in reaching landowners. Transfer administrative duties to the field forester supervisors.

Another idea to help gain efficiencies might be for Division foresters to mark/administer sales under the economic threshold thus assisting landowners in meeting their MFL obligations and providing additional wood for markets. The Forest Economic Summit also suggested having one DNR forester coordinate small timber sales throughout the state.

Require DNR follow through on their contracts with MFL landowners and allow WVWOA and other partners to engage the unengaged by sharing information and partnering on goals under the Division's Outreach and Education plan and techniques



learned through the Driftless Forestry Initiative. WWOA suggests reinstating DNR distribution of WWOA brochures to private woodland owners.

WWOA believes all private woodland owners (nonMFL, MFL, DMAP, etc.) should be served equitably by Division foresters in their requests for technical assistance. The Division of Forestry should not be preparing DMAP plans if they cannot also routinely write MFL plans or review cutting notices. Landowners interested in DMAP should hire a Cooperating Forester to write their plan like a landowner in MFL. If DNR must do these plans then time and monies should come out of hunting licensing fees to hire more DNR foresters to accomplish the task or contract these services out.

### **Questions to Consider – Private Forestry (non-MFL) Assistance:**

#### **1. What do you see as the pros and cons of this proposal?**

Before accepting the concept offered, the DNR should summarize the results/findings from the Driftless Forestry Initiative to reach "unengaged landowners" and share it with others for their input. Some landowners reject the concept of sustainable forestry and refuse to participate. Others will but are uninformed. How does DNR find them, track them and document success? In the meantime MFL landowners need assistance and are being ignored. WWOA believes landowners that have entered into the MFL program are entitled to DNR technical forestry services in exchange for the deed restriction they have voluntarily allowed the State to place on their land. This encumbrance created a relationship with the State generally, and the DNR specifically, that rises above any responsibility the DNR believes exists with the unengaged. Abdicating this fundamental relationship to a non-governmental individual or entity is a breach of the public trust.

While WWOA supports engaging as many private landowners as possible in sustainable forest management, we do not support the Division doing this at the expense of MFL and other landowners who are currently managing sustainably in order to reach the so called "unengaged".

The unengaged are unengaged for various reasons. How will DNR identify and make contact? Is the goal to get them engaged, enroll them in MFL and then turn them loose?

A lot of the noncooperating landowners do not want to be policed by the DNR. The attitude is "I'll pay the taxes as long as I can afford it and then on the market it goes" with no consideration of the MFL program. These parcels that could be well managed forest land are often managed for short-term gain such as development or quick depletion of their resources and thus are no longer beneficial to our state's industries.

Require DNR follow through on their contracts with MFL landowners and allow WWOA and other partners to engage the unengaged by sharing information and partnering on goals under the Divisions Outreach and Education plan and techniques learned through the Driftless Forestry Initiative. Reinstating DNR distribution of WWOA brochures.

#### **2. Does the type of assistance to provide for private forestry (non-MFL) make sense? Walk-throughs? Tree planting plans? Liaison with local WWOA chapters? Are there other types of assistance we could provide?**

Only if DNR services can be provided to all landowners – not if MFL landowners are treated differently in their requests for technical or program assistance. Walk-throughs? (Yes, already doing) Tree planting plans? (Yes, already doing) Liaison with local WWOA chapters? (Yes, already doing)

Besides things listed, we emphasize the importance of being in contact with children as well as adults.

**3. Are there issues that will need to be addressed if this proposal is implemented?**

Absolutely. Any time you take time and bodies away from a major program like the MFL, there will be issues that will surface down the road.

How will you assure the unengaged landowner that MFL is a good thing if you will not support their commitments under the MFL program after they sign on the dotted line and they must self-certify?

**4. Are there other ways we could achieve the desired outcome? How would those ideas be implemented?**

Stay engaged with existing MFL landowners – if you assist them, they will refer other landowners to you. Partner with WWOA and other organizations to help promote sustainable forestry. Provide resources to assist these organizations in programming such as field days, articles in magazines, newspapers, and television.

To engage the unengaged is a good idea, but taking the time from the engaged is a bad idea. There is a plethora of places other than MFL to find the time and manpower.

**Good Neighbor Authority**

WWOA supports increasing sustainable forest management on all land ownership types in Wisconsin. We understand the necessity of having a position dedicated to administering these federal agreements. We applaud the Division for stepping up to increase sound forest management of these lands.

However, WWOA does not support any Division of Forestry staff time or resources being allocated to marking or administering timber sales, or facilitating other land management and restoration activities on federal land. Rather, this work should be performed by the same private sector professionals that are currently qualified to write MFL plans and prepare cutting notices for the private landowner with no DNR oversight. If the DNR must, under its GNA agreement, perform the work directly, then it should hire LTEs specifically for this work and pay for them entirely through the stumpage revenues they generate. Supervision could easily be done by the Forest Service thus removing this additional burden from the DNR.

Again, WWOA reiterates that the Division states that private forestry is a high priority but has re-allocated private forestry resources to marking and administering Good Neighbor Authority timber sales. Sending private lands foresters to work on National Forests lands for two week time periods delays their response time to private woodland owners. Reducing the time commitment to the private forestry program

(greater than 60% of the forest land in Wisconsin and the land most at risk of abuse) is especially hard to accept when the Division is taking on additional responsibilities on Federal lands.

#### **Decommission Fire Lookout Towers**

WVOA supports and understands the need to decommission fire lookout towers. We understand that fire detection and reporting has changed significantly as the diversity and availability of technology has improved.

#### **Prescribed Burning Coordination**

This proposal should be a net zero proposal since it is stated that these are already coordinated within various programs. The creation of this position should be at the expense of time from the existing positions serving in this capacity. This position should not come from the Division of Forestry since the function is primarily used to manage wildlife habitats, grasslands and prairies.

#### **Priority #7**

##### **Rulemaking Process Improvements**

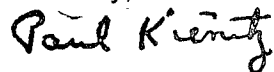
WVOA understands the need to improve the rule making process. We encourage the DNR to make the public input process accessible to as many as possible by continuing the current public comment period length and using a process that is easy for the public to understand.

WVOA appreciates the opportunity to comment on the **Summary of DNR Core Analysis Results** document. WVOA values our partnership with the WI DNR and Division of Forestry. We understand that this document contains concepts and ideas, some of which have not been fully developed, and we hope that our comments will be helpful in determining the Division's priorities and dedicated resources.

We firmly believe the Division holds a unique and important position in the Wisconsin forestry community. We strongly encourage the Division to fully staff and fund field forester positions which are so vital in providing on the ground technical and education assistance, and MFL/FCL legislative oversight to Wisconsin's 360,000 private woodland owners.

The Wisconsin landscape is a living history of what can be achieved on private forest lands with the assistance of the WI DNR and Division of Forestry. The regeneration of our forests and forest industries since the late 1800s was led by initiatives within the state legislature and WI DNR. WVOA encourages the WI DNR and Division of Forestry to place a high priority on technical assistance for all private woodland owners so that Wisconsin can continue to be a leader in promoting and achieving sustainable forestry.

Sincerely,



Paul Kienitz  
President

cc. via email per request - Carmen Hardin, James Warren, Darrell Zastrow