

Program Guidance - Actions to Increase Saw Log Availability on Department Lands Summary of Public Comments

August 14, 2014

Thank you to the individuals that provided feedback on the Department of Natural Resources (Department) assessment and guidance titled, "Actions to Increase Saw Log Availability on Department lands."

Three email comments were submitted to the Department during the comment period.

The comments did not suggest specific changes to the guidance, and as a result the Department did not make any changes to the guidance.

The Department will utilize the comments when communicating the guidance to DNR staff. The comments emphasized the importance of communicating the guidance to DNR foresters, stressing the need to emphasize the Departments continued commitment to sustainable forest management. Comments suggested that for those long term actions related to order of removal that they are developed with the continued commitment to sustainable forest management for the long term without comprising short term gains. Two specific questions were asked about the Departments approach and process to engage and respond to public and partners interests.

Response to Questions:

The Department seeks and is appreciative of stakeholders interests, questions, opportunities and impacts of state lands management. The Department fosters collaboration at and initiates forums best suited for the issue in an open and transparent manner. For the sawlog guidance, concerns was expressed on two marked timber sales and the department responded with a field tour to understand the concerns which prompted the Department to assess current practices and develop potential actions to increase a forest product in high demand without compromising sustainability. The public was provided the opportunity to engage and comment on the outcomes of the tour through the Department's Program Guidance Process, which is open for all interested individuals. The Department has, and would will continue to, respond in a similar manner to concerns expressed on any management element.

If you have any questions, please contact Teague Prichard 608-264-8883 or Teague.prichard@wisconsin.gov.

NOTE: The Natural Resources Board received an Information Item briefing at the August 13, 2014 meeting.

Comment #1

Thanks for the opportunity to comment on the proposed changes to increase sawlog production! As a recently retired DNR forester, I feel that I can provide valuable insight to potential impacts and suggestions to help maintain the integrity of the DNR's goal of sustainable forest management.

Of critical importance: The biggest danger is that the **wrong message will be communicated** to your staff when they see this reaction or change in policy. That foresters can get the impression that they are supposed to mark more sawtimber for sale, even outside the side boards of sustainable forestry. Clearly there is enough industry and political pressure that caused the Division of Forestry to react. Foresters also feel that. I did as an experienced, highly trained forester. You have a very young staff and getting younger. Will they understand you want them to continue marking in a sustainable manner (some may not even have a good grasp of the difficult northern hardwood management)? Or will they get the simple message of marking more sawtimber is the goal? Will they be concerned their sale will be scrutinized because "not enough sawtimber was marked" in some timber buyers opinion.

The order of removal is listed as up for review or change (I'm unclear). This additionally creates doubt of what should be marked. My experience with other foresters is that they carry many mis-conceptions and they will over-ride the order of removal which is a principle of sustainable forestry. Simply marking big trees to meet a perceived goal can quickly become unsustainable forestry and damage the stands for decades into the future.

I have been around long enough to come back to stands scheduled for another harvest only to find they weren't even close to being ready because the previous cut removed too much sawtimber. I have seen this occur on private and County forest land. So even though this policy is targeted for state land, there easily can be spill over across the ownership board. In fact I was feeling this pressure to mark or approve the marking of more sawtimber in an unsustainable manner several years ago on private land.

I understand that you must do this and most of the proposals are OK, however I am concerned of the out come of the review of order of removal. **But of higher importance, the Division of Forestry and supervisors all the way down the chain must strongly, clearly and believably stress and repeat the message that this does not in anyway change the Divisions commitment to practice sustainable forest management.**

Thank you for listening!

Comment #2

My sole concern with this Guidance is the perceived need to: "Evaluate the standard order of removal found in the Departments marking guidelines chapter and the Silviculture Handbook."

Since this sentence leaves it rather vague as to why the order of removal (OOR) requires evaluation, my comments will assume the worst: that those who desire sawlogs find the current order of removal to be stumbling block on their path to short-term financial rewards.

High-grading is the very reason the current OOR is necessary. Without a standard OOR that promotes developing quality in a stand, the mining of high quality timber continues to leave us with poorer and poorer quality stands. And that battle continues today. I get to manage many stands where I'm picking through the wreckage while walking among large, decaying stumps. It's little wonder that some have a harder time of obtaining the high-end logs they desire – that's the end result of high-grading in earlier times. Additionally, adjacent landowners see the results of current high-grading and think that must be what forestry looks like and then decide they don't want to manage their timber at all.

We spent many years developing the current OOR and many years desperately trying to adhere to it in the face of industrial pressure to circumvent it for short-term gain. We are still a long way from being successful with this and it's way too soon to capitulate. The fundamentals of the current OOR are sound. There is no need for DNR Forestry to make it any easier for high-graders to do their damage in our forests. In fact, it's way past time for DNR Forestry to quit wasting time and effort trying to accommodate the short-term interests of some into a "sort of" sustainable

forestry. Stand tall and call it what it is – unsustainable – and move on. Just like in other aspects of life, you can't be a little bad and still be good. High-grading is high-grading, whether you do a little or a lot.

I'm tired of seeing DNR Forestry get rolled by short-term industrial demands. We all need to be thinking long term, not just about what happens in the next quarter. I'm looking for leadership. Hopefully, I'll find some.

Comment #3

I represent "The Wisconsin Chapter of The Wildlife Society" on the Silviculture Guidance Team.

On Friday I stopped by Trout Lake and talked to Jeff Olsen about the Saw Log Availability Guidance and he helped me understand the document. We have two main questions:

1. Why did the Division of Forestry respond to one logger's complaint with a massive field trip and review? We wonder if the Division would have responded in like manor if a wildlife habitat or ecological concern was expressed.
2. Why was the public represented only by timber industry people? Why weren't representatives of conservation and recreation groups on the tour?

Overall, the Forestry Division did a great job addressing the saw timber availability needs. We fully support the Division's strategy. Master Plans are developed with a great deal of public input and must be followed. If the Master Plan needs amending then a process where all the interest groups that helped develop the original plan and a full spectrum of current interest groups must be consulted.

Thank you for this opportunity to comment.