

**Summary of Public Comments Received About Proposal
To Modify Existing Program Guidance
Knowles-Nelson Stewardship
Local Units of Government Subprogram Criteria**

Thank you to everyone that provided comments and feedback to the Department of Natural Resources on the modification to the existing program guidance titled “Knowles-Nelson Stewardship Local Units of Government Subprograms Criteria.”

The Department made the following changes based on the feedback:

Section 3 – Stewardship and LWCF Project Rating Questions

- Question 11 Corrected the point values to correctly reflect points to be awarded.
- Question 22 Question was revised to accurately reflect the Brownfield statutes.
- Tiebreaker 7 Question was added for Green Tier Legacy Communities.

A request to add several criteria to the Urban Rivers and Urban Greenspace subprograms was reviewed by the Department. Results of a 5-years analysis of project applications and awards; funding trends from the last major criteria rewrite which focused selection on project merits (2011); the new 2011-2016 Statewide Comprehensive Outdoor Recreation Plan (SCORP) goals; program requirements; question relevancy and value; criteria duplication; and county statistics indicated that the number of funded projects for highly populated, developed areas increased with criteria focusing on project merits. Thus, the Department decided not to make any additions but we will monitor the issues and will reconsider this decision if needed.

Section 4 – Acquisition of Development Rights Rating Questions

- Question 1b Link was added as requested.
- Question 3 Link was added for nature-based outdoor recreation definition.
- Question 4a Clarified natural communities as rare natural communities.
- Question 5 Renamed to Land Use Planning to correctly identify considerations being made.
- Question 5e Question was deleted since it was no longer relevant.
- Question 6 Corrected question description to one point.
- Question 11 Clarified discussion to reflect question intent.
- Question 12 Question was added for Green Tier Legacy Communities.

A request to add more clarification on criteria standards for Question 9 was reviewed. It was determined that this is best completed during pre-application discussions between the sponsor and Department staff, thus no change was made.

This document includes all the public comments received for this proposal.

If you have any questions regarding this final guidance document, please contact Lavane Hessler at (608) 267-0497 or Lavane.hessler@wisconsin.gov.

Hessler, Lavane J - DNR

From: Curt Witynski <witynski@lwm-info.org>
Sent: Wednesday, February 26, 2014 2:22 PM
To: Hessler, Lavane J - DNR
Cc: Sukup, Laurel C - DNR; Steve Hiniker
Subject: Proposed Revision to the Stewardship Local Units of Government Grant Program Ranking Criteria

Lavane: I'm writing on behalf of the League of Wisconsin Municipalities. The League is a nonprofit association of all 190 cities in the state and 394 villages. I've reviewed the proposed revision of the Stewardship Local Units of Government grant program ranking criteria and have one comment to offer.

The League is one of the initial signers of the Green Tier Legacy Communities Charter. The Charter is a unique partnership between Wisconsin communities, non-profit organizations, and the Department of Natural Resources. Participants work together to assist communities in developing and implementing sustainability measures. As Charter members, municipalities take actions and share information to achieve superior environmental stewardship by focusing on sustainability practices and/or water resources management. Collaborating communities are able to advance toward their sustainability goals more quickly and efficiently. More information about the charter is available here: <http://dnr.wi.gov/topic/GreenTier/participants/LegacyCommunities.html>

Other grant programs administered by DNR have, as part of their ranking criteria, provided points for applicants that are participants in the Green Tier Legacy Communities Charter. I urge the department to consider modifying the Stewardship LUG grant program ranking criteria to give points to municipal applicants that are participants in the Green Tier Legacy Communities Charter.

Thanks for considering our comment.

Curt Witynski
Assistant Director
League of Wisconsin Municipalities
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Hessler, Lavane J - DNR

From: Jim Welsh <jim@nhlt.org>
Sent: Tuesday, March 04, 2014 3:51 PM
To: Hessler, Lavane J - DNR
Subject: comments on ADR rating questions

Lavane, I have reviewed the proposed rating questions for the ADR program. Here are my comments:

1. b. it is always helpful to know what lists or inventories the applicant should review. Would you consider including a link to the qualified lists or inventories?

4. a. "natural communities" is a very broad term; it would be hard to imagine a property that doesn't have a natural community on it. Does this question help distinguish between applications?

5. e. it would be helpful to know what is the practical difference between "initiating" and "increasing" rural fragmentation. For instance, how nearby does other development need to be before one would say that development on the subject property is new or just is the latest increase? It seems like pretty much everywhere in Wisconsin the natural landscape is already fragmented.

6.b. The italics mentions a "half point" but the score is a whole point.

9. It would be helpful to know what the objective criteria is here. If a project adds to the amount of hunting land in the vicinity of a village that has a hunting/hardware store, it seems like it would add to the communities economic development plan by potentially increasing demand for the products at the hunting/hardware store. Would that qualify? Or would the economic development plan have to specifically mention allowing public hunting on the property or in the vicinity?

3, 10, and 11. 10 and 11 use the five NBOAs and so it is clear what the rating is about. But in 3, does "nature-based outdoor recreational opportunities" mean other things? If a property is opened year-round to birdwatching, does it get 3 points under 3.b.? It might be helpful to state what is meant by nature-based outdoor recreation under 3.

Also, in Q. 11, how many of the categories do you have to check to get the 2 points?

Maybe 3, 10, and 11 should be combined or at least grouped together.

Please let me know if you have any questions about my comments. Thanks for the opportunity to comment on the rating questions. Jim

--
Jim Welsh
Executive Director
Natural Heritage Land Trust
608/258-9797
nhlt.org

DATE: March 4, 2014
TO: File
FROM: Lavane Hessler
SUBJECT: Bureau of Remediation & Redevelopment Criteria Comment

Darsi Foss, Barry Ashenfelter, and Christine Haag of the Bureau of Remediation & Redevelopment provided this verbal comment and updated language for the LUG criteria Brownfield question. This updated language will reflect legal changes affecting the R&R program since the last revision of this question in 2003.

Current question is:

BROWNFIELDS SITE

a. **The sponsor has signed an agreement with the DNR to do necessary investigation and remediation work on a brownfields site. (2 pt.)** *The sponsor must submit a copy of the agreement with the application to receive this point.*

OR

b. **The project is on lands in process of remediation or remediation has been completed. (3 pts.)** *The sponsor must have a remediation plan and schedule approved by the DNR. Documentation of the both must be submitted with the application to receive this point. If remediation is completed, a copy of the close out letter from DNR must be submitted*

Proposed revised language:

BROWNFIELDS: The project involves brownfields redevelopment, as term is defined in s. 23.09(19)(a)1, Stats., and the sponsor pledges to sign an agreement with the DNR under s. 292.11(9)(e)7, Stats., prior property acquisition. This agreement requires the LUG to conduct any necessary sampling and cleanup of the property, if determined necessary by the Department, once the property is acquired. (3 pts.).



CHRIS ABELE, MILWAUKEE COUNTY EXECUTIVE
JOHN DARGLE, JR., DIRECTOR OF PARKS, RECREATION AND CULTURE

March 10, 2014

Ms. Lavane Hessler
Financial Assistance Specialist
Wisconsin Department of Natural Resources
1300 W Clairemont Avenue
Eau Claire, WI 54701

Dear Ms. Hessler:

I am writing in response to the proposed changes to the scoring criteria for the Stewardship Program referred to in the DNR's 2014 request for Stewardship applications. After careful review, two of the proposed modifications stand out as being problematic.

The first is item #20 in Section 3 (of the proposed revised criteria), relating to the county population where the project is located. Under the current criteria, if a county has a population of 200,000 or greater it is awarded a point. That criterion has been removed under the proposed scoring modifications. My concern is that this will eliminate the mechanism by which residents living in more densely populated counties are put on a more equal footing with those living in less populated counties in terms of having access to parks and recreational facilities. This is inconsistent with what I understand was one of the main purposes of the legislation that created the Stewardship Program, which was to provide the means to more fully accommodate the recreational needs and demands of persons living in urbanized areas.

The second item of concern is #33 in Section 3 (of the current criteria), and relates to the acquisition of lands threatened by development. Under the current criteria, a point is awarded for lands deemed to be threatened by development. The proposed criterion eliminates that point. We believe eliminating the point would be a mistake because the criterion enabled application evaluators to differentiate between parcels that might be acquired shortly after being placed on the market and those where there was less interest by parties other than the local unit of government. This provided local public officials an extra measure of responsiveness when presented with an opportunity to acquire high priority parcels of open space. Elimination of the point removes that extra level of responsiveness and could result in missed land acquisition opportunities, which would undermine DNR efforts to achieve Stewardship Program goals relating to the protection of priority open space lands. As I'm sure you are aware, once land is acquired by someone whose primary interest is development it can be very difficult to redirect the ultimate use of the land to preservation and recreational needs. Hence, it is vital that local units of government be able to respond in a timely manner when a parcel of land becomes available.

Although the two items discussed above only amount to 2 points, 1-2 points can often be the difference between winning an award and not winning an award given the highly competitive nature of the



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Stewardship Program. Therefore, I strongly urge the Department of Natural Resources to reconsider the proposed changes to the Stewardship Program rating criteria cited above. Thank you for your consideration of our position on these matters.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Dargle, Jr.", with a stylized flourish extending to the right.

John Dargle, Jr.
Director