

Public Comment - Process

The development of the “Strategy” grew from two previous planning efforts: Wisconsin’s Sustainability Framework (2007) and the Statewide Forest Assessment (2009).

Throughout the last three years, the Division of Forestry has worked with partners and the public to develop these documents.

Sustainability Framework

The Sustainability Framework is the result of a Governor’s Council on Forestry initiative to determine how to measure the sustainability of Wisconsin’s forest resource. A committee made up of different conservation organizations, forest industries, agencies, a tribal representative, universities, and private landowners developed the document. This document was reviewed by forestry experts, government agencies, tribes, partners, and the public.

Statewide Forest Assessment

The “Assessment” used the Framework as a blueprint to gather information. The “Assessment” draws on a wealth of data and analysis from partners and other agencies. Forestry experts, government agencies, tribes, partners, and the public were asked to review the “Assessment” and prioritize the major conclusions. Meetings were held with major stakeholders to discuss the results. These included the Governor’s Council on Forestry, USDA Forest Service, Wisconsin Woodland Owners Association, Urban Forest Council, Wisconsin Forest Stewardship Committee, Voigt Task Force, National Resource Conservation Service – State Technical Committee, and other DNR Divisions including the Bureau of Endangered Resources which manages Wisconsin’s Wildlife Action Plan (WAP).

Statewide Forest Strategy

The first draft of the “Strategy” was developed by a DNR ad hoc committee in January and February, 2010. Due to the federal requirement to submit our “Assessment” and “Strategy” by June 2010, we decided to develop the first draft internally. From March 23 to April 30, five surveys were posted on-line for anyone to comment on the strategies and actions in the five different themes. Emails or letters were requested as well.

In March, April, and May, we held meetings with major stakeholders to inform them of the “Strategy” and discuss the document. These included the Governor’s Council on Forestry, Urban Forest Council, State Trails Council, Wisconsin Forest Stewardship Committee, Voigt Task Force, Wisconsin Native American Tribes, Great Lakes Forest Alliance, Wisconsin County Forest Association, Wisconsin Woodland Owners Association, DNR Fire Department Advisory Council, Natural Resource Conservation Service – State Technical Committee, Chequamegon-Nicolet National Forest, Great Lakes Timber Professionals Association, and other DNR Divisions including the Bureau of Endangered Resources which manages the Wildlife Action Plan (WAP).

We requested people comment and suggest edits to the strategies and actions. We specifically wanted to learn which strategies and actions people thought were important

and which should be deleted or edited. The draft “Strategy” for review did not represent all perspectives and ideas. We specifically asked reviewers if there were other strategies and actions that should be added in order to represent the range of perspectives held by forest stakeholders.

For every strategy, the surveys asked three other specific questions:

1. Some strategies are best implemented statewide and other strategies are best implemented only in specific landscapes. Should this strategy be implemented statewide or in landscapes based on certain criteria?

[This question was asked to get a sense of where people think different strategies should be implemented. The USDA Forest Service requires that we identify priority landscapes and issues.]

2. Of the actions for this strategy, which TWO are the most important to address the strategy over the next 10 years? (Only choose 2.)

[This question was asked to see if there was consensus on certain actions that would signal future support. We hope the forestry community will find it valuable to see which actions are selected as most important and use that information for their strategic plans.]

3. Would your organization and/or you personally want to be involved in implementing any of the actions in this strategy? (Check all that apply.)

- Yes, I personally want to be involved.
- Yes, my organization wants to be involved.
- I cannot speak for my organization.

[The strategies will not be implemented unless one or more public or private entities initiates it. Based on who responds to this question, we will facilitate future conversations amongst the interested groups.]

The Department has reviewed the comments received and modified the “Strategy” based on the feedback. Where a majority of people suggested a similar change or addition, it was made. When someone requested terms be defined, we have added definitions to the strategy descriptions. Many individuals shared their opinion on the efficacy of strategies and actions, but did not propose changes. By July, we will collate these opinions and share the common themes on the Division of Forestry webpage. Several people suggested new actions and these have been added to the chapter: Possible Actions.

Public Comment - Synopsis & Response

The following is a synopsis of the comments received on the “Strategy”. We requested people complete five surveys on line or send an email or letter with their comments. We also met with over fifteen stakeholder groups to discuss the “Strategy”. The bulk of the discussion presented here addresses comments that were made by stakeholder groups and those that sent emails or letters.

There were 330 surveys completed for all of the themes. At a minimum, there were 108 individuals that completed the surveys. Most likely individuals completed two to three surveys. The strategies within Theme A had the most comments with the range of comments per strategy being 12-25. The range of comments per strategy was considerably less for the other themes.

	Completed Surveys	Range of comments per strategy
Theme A	108	12 - 25
Theme B	69	1 - 10
Theme C	55	2 - 12
Theme D	51	0 - 7
Theme E	47	2 -10

Of the fifteen stakeholder meetings, the Governor’s Council on Forestry and the Forest Stewardship Committee are the two advisory groups we had the most in-depth discussion with. Both of these were day-long meetings where overall process was discussed and almost every strategy was commented on. The Governor’s Council on Forestry decided that it was most important to focus on discussing the goals and strategies and providing feedback on these. They found greater consensus on these than the actions. The Forest Stewardship Committee provided new ideas for actions and evaluated the effectiveness of many of them.

We received sixteen direct emails and letters from individuals, companies, and organizations. Many of these stated they were interested in staying engaged in the conversation on the strategies.

A range of organizations identified themselves in the survey and direct correspondence. This list represents the range of groups that shared comments and edits:

General public

Advisory boards:

- regional collaborations
- Councils

Associations:

- professional societies
- Industry groups
- family forest land owners

Conservation organizations:

- forests
- land use
- wildlife
- wetlands

Business:

- industry (paper, loggers, timber)
- consultants (tree care and forest management)

Government agencies:

- local, municipal, county
- state
- federal
- tribes
- academia

The majority of the comments both from the direct communication and via the survey can be characterized by one of the following concerns:

1. Intent of the “Strategy”
2. Impacts on property rights
3. Too much reliance on government
4. Process to develop the “Strategy”

1. Intent of the Strategy:

There were many comments regarding the intent of the “Strategy” and how it would be implemented. The idea that the “Strategy” should reflect actions that all partners can do was difficult for people to understand.

- There is a belief that DNR will be the leader on all the strategies and all of the actions will be implemented. For example, in one comment, they interpret “public” lands to mean DNR rather than all public entities (other state agencies, federal, county, town, city etc).
- Many thought the “Strategy” will instantly be implemented. Two individuals used the term “passed”. Others thought the majority of the actions will remain rather than being a list of actions offered for consideration with the intent to further refine.
- Several thought strategies and actions did not include topics they are concerned with because they were not specifically stated. Strategies and actions were broad and purposefully did not try to describe every component. For example, a

strategy regarding improving forested communities would not list 'forested wetlands' specifically.

- Many thought all the strategies and actions were new and this implied more government.

RESPONSE:

It appears that key messages we tried to convey were not "heard." Those key messages are:

- The "Strategy" includes multiple ideas which will be sifted, winnowed and prioritized. This will not be done by the DNR alone.
- The intent is that the forestry community as a whole be involved in implementation of the plan.
- The plan is not a final decision; it is the start of an on-going conversation for the forestry community.
- The strategies and actions collectively cannot be tackled by one group, organization or agency.
- The strategies are not all new ideas. Nor do we suggest they all be implemented.
- We fully anticipate that there will be actions that are not worked on due to lack of interest by the forestry community and/or not being a priority in comparison to other efforts.
- We do not presume to know which organization or group can best accomplish a strategy or action, or who has the expertise to do so.
- Lastly, in regards to the scope of the document, strategies and actions were broad and purposefully did not try to describe specific components.

2. Property Rights:

There was concern regarding the potential negative impact some strategies would have on property rights and a landowner's ability to make decisions on their land.

- Several thought that strategies were restricting property rights which would result in a decrease in property value.
- Several were concerned with potential zoning and regulation of parcel size and being forced to manage for landscape scale goals.
- Another comment cautioned that the "Strategy" must remain cognizant of private property rights and the perception of too much government intervention while at the same time trying to provide forest benefits for all citizens of Wisconsin; a difficult balance to achieve.

RESPONSE:

As mentioned in the response for number one above, we fully anticipate that there will be actions that are not worked on due to lack of resources and/or not being a priority in comparison to other efforts. There is strong recognition in Wisconsin of private property rights. There is an expectation that efforts to realize the array of public benefits

derived from forests use tools that respect basic landowner rights while encouraging actions that enhance public benefits.

Those actions that might be perceived by some as threatening property rights identified methods (zoning, comprehensive planning) which normally require a separate system of public input. As a result, use of these tools will not be possible without additional dialogue by the public.

Interestingly, most of the actions that might be viewed as having the potential to impact property rights were selected as a preferred action in the survey by the respondents. Two of the strategies which specifically mention zoning and planning (6 & 18) were preferred. This suggests that there are diverse options about these tools and their use to achieve the stated goals.

3. Too much reliance on government:

Many comments expressed that there was too much reliance on government regulation and economic controls or incentives.

- There were suggestions to focus more on outreach and education instead of incentives.
- Some felt the reliance on government funding is not realistic in this economic time which means that the majority of actions based on government funding would, in actuality, not be implemented.
- One company said they “support the state buying land, but it then needs to be managed. Historically, the trees on state-owned forestland are not cut to the allowable cut, the forest becomes overgrown and that decreases the amount of forest products that come from the land ...and therefore hurt industry.” (strategy 11)
- One group expressed their concern with big government this way: the “Strategy”... “does not satisfactorily value private enterprise, free markets, individual or institutional initiative to reflect and meet the needs and desires of customers in order to facilitate the achievement of the survey’s various goals.”
- One reviewer advised that “the document must remain as balanced as possible to best represent the diverse views among Wisconsin’s forestry community members.” The abundance of comments focused on government intervention may reflect that people did not see the “Strategy” as balanced.

RESPONSE:

Due to the concerns expressed regarding lack of actions containing education and outreach, we will encourage discussion of this issue when we facilitate conversations amongst partners to talk about how the actions can be implemented and by whom.

Additionally, the Division of Forestry will discuss this when we review the “Strategy” and assess what our role and niche is for the strategies.

In regards to heavy reliance on government funding and perceptions of ‘big government’, as stated before, it was not the intent of the “Strategy” that all of the actions be implemented, nor that government at any level be the lead on them all. We agree that government, even in a healthy economic environment, would not have the resources to support all the incentives identified in the strategies. However, it is also important to note that a number of the incentives identified in the “Strategy” already exist. The “Strategy” is not focused merely on adding to what is already done; rather, it is focused on discerning what strategies and tools are most likely to achieve the desired outcome, irrespective of whether they exist today. It appears some of the concern about “big government” may have been due to the perception that the listed strategies and actions were all over and above what is implemented today.

Based on the responses to the survey and comments received, we hope to be able to identify those circumstances in which the forestry community believes incentives are most important. We will then use this information when deciding what the Division of Forestry’s role and niche is for those issues as well as when we prioritize where and how we will allocate our resources during the next 5-10 years.

4. Process:

There were two concerns regarding the process to develop the “Strategy”. The most prevalent comment regarding process dealt with stakeholder involvement.

- There is a concern that stakeholders (non-DNR) were not involved in the development of the actions primarily, but goals and strategies were also mentioned. It was suggested that doing so would have provided a broader range of ideas based on a wider range of perspectives.
- Some thought the themes and strategies were organized in priority order. They are not. Theme A, ‘Fragmentation & Parcelization’, is not more important than Theme D, ‘Forests as Economic Contributors.’
- Many wanted terms better defined (e.g. passive, appropriate, large block, preservation, and remote).

RESPONSE:

The development of the strategies is part of a 3-year planning process which started with the Governor’s Council on Forestry’s initiation of a Sustainability Framework. The Division of Forestry engaged partners in the development of the framework and review of the “Assessment”. We have once again engaged our partners and the public in development of the “Strategy”. The Division requested the public and partners to prioritize the major conclusions from the “Assessment”, the feedback from which directly influenced the development of the draft goals. The DNR used an ad hoc committee to

write the first draft of the strategies in order to produce a document quick enough so that there would be sufficient time for the public and partners to respond and provide comments before the June 18, 2010 federal deadline for submitting the “Assessment” and “Strategy”. In our request to reviewers, we specifically asked for new ideas and edits to the existing strategies.

Many people who commented wanted terms to be better described. It is likely that it would have been easier for people to provide their opinion if they completely understood each strategy. In the final “Strategy”, definitions have been included where they were requested. In some strategies, terms are not defined because doing so is a part of implementing the strategy. For example, people requested that the term “appropriate” be defined. This can only be defined by those who work to implement that particular strategy. We anticipate a group of stakeholders working together to decide what those terms mean within the specific context of their work.