Program Guidance – Recommendations for a Reforestation Program

Summary of Changes Based on Public Comments

Thank you to the individuals that provided feedback on the Department of Natural Resources (Department) proposed “Recommendations for a Reforestation Program”. Twenty comments were submitted to the Department. Included in this document are all of the public comments received.

The comments submitted both supported various components of the recommendations, as well as contained concerns regarding some of the components. As a result, the Department did not make any changes to the recommendations. As the Department moves forward in evaluating the feasibility of implementation of the recommendations, public input will be solicited.

If you have any questions, please contact Carmen Hardin at (608) 267-3139 or carmen.hardin@wisconsin.gov
To Whom it may concern,

I just completed reading the states “Recommendations for Reforestation Program”. I see that public comments are welcomed, involving the parameters of the program. If applicable, I want to submit a couple thoughts I have on the program.

By far I do not hold the knowledge or resources like the WDNR to make sound decisive decisions or informed suggestions regarding Reforestation in Wisconsin, but I would like to share my recent experience involving purchasing WDNR nursery trees for the vacant property I own behind my house. Just a little history, I recently purchased just over an acre of vacant land behind my current property. That acre was initially part of a 40 Acre parcel of mixed vegetation of prairie type grass and pine/oak woods. The land was sold earlier this year to a developer. The developer is putting in a 72 lot subdivision in that 40 acre plot. To get to the point, I was able to deal directly with the developer and purchase just over an acre to add to my current property.

Being I live on the very outskirts of town (Greenville, WI), there is quite a bit of farmland, woods, open grass field (it’s the reason I live there). Up to this point we had great views of the Wisconsin outdoors and were visited frequently by Deer, Turkey’s, Raccoon, an occasional Pheasant and once in a while a Fox or two. The main reason I wanted to purchase at least some of the land was to conserve some wildlife in the area. Being on the side of a younger generation/workforce, my wife and I could only extend our finances so far. After wheeling/dealing with the developer, just over an acre was about the extent of our financial capability.

To get to the meat and potatoes of the story, my first thought into this acquired open acre behind my house was to plant trees, a lot of them. I do spend quite a bit of time in the outdoors. During that time I’ve been learning the different forest ecosystems in the state and how the wildlife population is dictated by their natural environment. I wanted to take what I have learned from other forest ecosystems in Wisconsin and apply it to my land. Geographically, this state has quite the extensive multitude of different ecosystems and so came my first hurdle; How can I successfully reforest my acreage with the right variables for my area? What tree’s to plant? How many? How to arrange/plant them? Also, what kind of vegetation will attract and harbor and maintain my local wildlife?

Looking into buying tree’s online and local nurseries it became apparent that to plant a decent number of tree’s was going to cost me quite a substantial amount of money, to accomplish a natural woods like setting. Using google search engine, I got lucky and just happened to stumble upon the Wisconsin DNR Nursery program. I spent quite a bit of time further researching it and was delighted to find the affordable pricing associated with locally established/grown tree’s. Question was still how many, what kind and where? I see on the application they give out local numbers for local county DNR foresters who will help establish a planting plan, site preparation plan and species of tree’s that will thrive in my local area. It’s a great idea, but recent attempts to get a hold of the local forester have been fruitless. From researching more online through the DNR database, US Forest Service, Arbor Day Foundation as well as other sites, I’ve tried to gear myself with as much viable information as possible to create my own planting plan, number of trees, type and location. I have also paid close attention to my local surroundings to see what vegetation thrives and where. I’m set forth to pick up my tree’s from your Nursery at Griffith Nursery in Wisconsin Rapids, WI this coming spring.
So, what I’ve Learned in this whole process. First would be the DNR’s Reforestation/Nursery program is not very publicized. I don’t know what route I followed on the world wide web to find out about the Nursery’s and the program, but I know it was an obscure lucky path to get there. To me it seems there could be some sort of different outlets to broadcast or find this information. I’ve been spreading the word about the program to others since I discovered its existence, but word of mouth only travels so far. A couple ideas that come to mind to make the program more visible to the public would include a few things along the lines of; Posting information at local town halls or court houses, possibly done by volunteers or the local designated forester. A short radio ad would definitely expose the program to thousands, and then word of mouth. Last would be properly marketing the program on popular search engines like google, bing and others. As I experienced there is no real truth path to find out about the DNR’s Reforestation and Nursery programs. Utilizing the proper keywords could possibly bring more favorable results for getting information out to the people.

Another thing learned is possibly have different outlets to gain local information about habitat, wildlife and natural areas in and around my community. Not being able to reach my local forester is/was a hurdle, but I believe I managed to acquire enough information to plant a sustaining stand of woods behind my house. Could the DNR possibly include local resources such as county, town, village conservation resources in their Reforestation program? Or even possibly outlying internet based resources?

Last thing I noticed was the incentive side of things. I did research the links to incentive plans written up in the Reforestation Program that I’m referencing. My wife and I are blessed with owning 17 acres in Florence County adjoined to National Forest, to enjoy the outdoors of Wisconsin. But, going through the different programs I see there really isn’t much as an incentive program for acreage 10 and below (like the acre I bought behind my current residence). Obviously state funds are not endless and a line needs to be drawn between actual reforestation vs. someone planting a couple dozen trees on an open spot on their property. Again, I don’t hold the knowledge and expertise the WDNR holds regarding land mass and natural sustainability, but one would guess an area under 10 acres can still be a vital ecosystem to resident wildlife diversity and reforestation. Outside shared costs or tax breaks, just being safeguarded/protected under the state would be an excellent incentive in my eyes. I know in my local community the town board seemed pretty weary of me not developing that acre (I’m guessing because of income tax purposes), but never the less they approved. I’ve heard in others communities I wouldn’t even have that opportunity to reforest the acre due to ordinances/covenants. I have no idea, but having the smaller acreage in some sort of State/Federal reforestation program might allow that to happen for those restricted land owners?

I apologize for the lengthy letter. I guess the best way to sum up my experience and what I learned is basically paint the whole picture for you. I appreciate all the efforts by the state to encourage and maintain smart Wisconsin foresting and the reforestation program. This truly is a beautiful state with vast areas of un-captured wilderness for us all to enjoy, now and down the road. I hope I shed some light from a citizens perspective and do appreciate you taking the time to read this letter.

Take Care,

William Bowden
920-740-4906
Good morning Carmen,

Since today is the last day of public comment on this matter, can you please verify that you have received these comments? Thanks!

I am offering my comments on the RFI regarding the Recommendations for a Reforestation Program (RFI# C-026-20).

In my opinion, some of the information in the Recommendations for a Reforestation Program document greatly conflicts with the input of those that work for the state and have offered up their comments on the matter. On one hand, the proposed recommendations state several times that the purpose of the state nursery program is to "work in concert" with private nurseries, and meet the statewide seedling demand by "combining with private sector capacity". Yet, one state worker who commented in the first round of public comments and works at the Griffith State Nursery made these statements:

- Refers to private business as "competition"
- Recommends that the state nursery program market to even smaller tract land owners (1-9 acres) and reduce the minimum order to 500 or less in order to further compete with private nurseries
- Refers to a former time when the state could afford to be "benevolent" (well meaning and kindly) to private nurseries and says that the state can "no longer afford such benevolence"

Most nurseries and nursery dealers will tell you that their sales have also declined for several reasons, largely due to economic decline and the reduction or elimination of most cost sharing programs. It is hard to swallow the claim that the state nursery program is partly designed to supplement the shortfalls of the private nursery industry. A short talk with most private nurseries or nursery dealers will reveal that they rarely run out of stock to sell. In fact, more seasons than not, growers are forced to plow a great deal of viable stock under at the end of the year due to lack of sales. Any expansion or strategy which will compete with the private nursery industry in the state will have a direct adverse affect on Wisconsin companies, families and our economy. This should not be the focus of a state run program.

One of the stated goals throughout the recommendations is that the state needs to provide access to seedlings at economical prices. Right now, the prices at which state grown nursery stock is offered are really not realistic. I believe that an in depth audit of the state's nursery program in which the true costs involved were revealed would show much less revenue being generated than what is thought. Equipment, infrastructure, outside support from various departments in the state, office space used in public buildings and the compensation packages (salary, insurance, retirement and other benefits) of all who work on the state nursery program add up greatly. Private nurseries could never sustain a business model by offering seedlings at state nursery prices. I believe that an audit should be part of the recommendations so that the true costs of the state nursery program can be brought to light and prices set accordingly. I believe that the results of an objective audit would be extremely eye opening. An audit would verify the true costs associated with running the program and allow the state to reconsider its pricing structure. In the end, the department would emerge more informed and better positioned for long term success. An "economical price" is truly relative to the overall market. More realistic pricing would help lift prices for the whole industry in the state instead of artificially driving market prices down. When private businesses believe their operation is in need of additional revenue because their costs have risen or their margins are not high enough, they raise their pricing structure. The DNR
needs to seriously consider this as an option; price increases over the years do not appear to have even kept up with the rate of inflation. I believe that the DNR is doing a disservice to their program as well as the private nursery industry by keeping prices as low as they are.

Great care should be taken in order to define the mission of the program. That mission should exclude direct competition with the state's private nursery growers and dealers. If the state considers a partnership with a handful of large nurseries in the private sector, the state would effectively be teaming up with private industry to compete against nurseries who are be smaller and not part of a partnership. Any partnerships that are forged should be with private nurseries who are located in the state of Wisconsin. Partnering with companies out of the state or in Canada would redirect dollars out of the state and be counterproductive to our economy. Working with many smaller nurseries which may each specialize in several specific species (either bare root or containerized) would be an option. This idea would spread the revenue around in the state to those that need it most and dilute the exposure of the DNR to crop failures and said companies going out of business.

No doubt the state nursery program serves a well needed function. Outreach, research, education and the production of seedlings for state programs and some reforestation efforts in the private sector is acceptable. However, in my opinion, making changes which will make the state program even more likely to directly compete with private nursery industry is not.

Sincerely,

Dean A. Koch

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262.377.5330 - Local Nursery Office
www.chiefrivernursery.com
From: Corrine M. Daniels <Corrine@appliedeco.com>
Sent: Thursday, November 21, 2013 10:48 AM
To: Hardin, Carmen R - DNR
Subject: DNR Proposed Program Guidance Forsest Management  COMMENT

Forest Management | Proposed Recommendations for a Reforestation Program

- Explore the feasibility of growing seedlings of native species not currently available commercially from the private sector. Continue work with improved and disease resistant varieties of native species and investigate native species that are not widely distributed across Wisconsin, but may be favored by a warming climate.

Hello – Thank you for the opportunity to comment. My comment pertains to the bullet above.

1. The native seed business to maturing quickly in the Midwest, and in Wisconsin in particular. It would not be appropriate for The State is begin producing (and competing) with private business in this sector. The private sector is driven by demand. If there is sustained demand, and a demonstrated willingness on the part of The State to pay a fair price for the product, it will be produced. Problems with current supply are primarily based on the buying behaviors, not on producers’ ability to production product.

2. The production of disease resistant varieties is potentially very destructive to the native population’s abilities to adapt and respond to changing conditions. The practice of breeding and selecting for that purpose is not recommended. Research abounds on the significant negative impacts of these types of plant breeding activities and the damage done to naturally occurring populations when they are released.

Regards,
Corrine Daniels

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Hi Carmen. In years past, two non-native conifers were rightly-in my opinion-grown and offered by DNR seedling nurseries, namely Norway spruce and European larch. While I love native plant communities as much as the next guy, and in fact, probably quite a bit more than the next guy, I believe it a mistake to remove these two from the list of offerings.

I know “native” is all the rage, and for many good reasons. There is however, a difference between problematic exotic species and those which not only do not pose a significant threat to the state’s biodiversity, but which can actually act to enhance it. And as we continue to lose species due to non-native pest and disease organisms, this natives-only policy is going to become increasingly untenable. For an example of what I mean by that, we need to look no further than what is happening to eastern hemlock in that part of the country where the wooly adelgid is active. While I’d love to learn that resistant races of hemlock had been found and were being dispersed across the landscape, I see that as, at best, a remote possibility. Meanwhile, whatever niche that tree occupied is simply being emptied out. There can and will be similar examples right here in WI.

Norway spruce has been used in forestry for so long here that it has in some ways come to seem at home. And in terms of performance, it quite simply beats out any native spruce. Much the same could be said of the European larch, which formerly attracted a good deal of attention as a possible viable aid to the overall Great Lakes timber industry. It is disappointing to me to see what I regard as little more than a fad sweeping these species out of consideration.

Of course, folks like me can still purchase these two species for our own use from private vendors. But their removal from the “official” DNR listing does them, and us, a disservice. FWIW, I have planted thousands of a hybrid larch-Larix marschlinisii-on land I own in Oconto County. I do have native tamarack in the lower, wetter part of my nearby woods I own there and I love these too, but on regular upland soils, the decidua/kaempferi crosses are simply amazing, and amazingly beautiful. Likewise with Norway spruce, I should think I’ve planted five thousand of those things by now. This year alone, many put on as much as five feet of new growth! I think such plants offer too much to be banished forever from our list of available species, nor do I think they will be forever banished. Someday, at some point, the common thinking is going to get beyond the “natives-only” paradigm, and we’ll realize we just need to match species with conditions, in the best way possible. That might not necessarily mean just those species now offered.

I do plant lots of native trees too, and in my occupation, I deal primarily with native restoration. Nevertheless, I wanted to get these comments to you before the door shuts. Thanks for reading!

Thomas Duffey-Horticulturist
City of Appleton Dept. of Public Works
920-832-6451
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Hi again,
I see you're out of the country, so I'm hoping to still add a few comments, specifically about the the proposed state nursery expansion into larger plants, possibly to be sold to private nurseries to grow on for use in public and private landscapes. As I understand, the purpose of this is to help WI nurseries to produce the plants which are currently in short supply.

The following are some reasons for these shortages:
*Many of the desired plants have always been in short supply because of the difficulty in propagating them, such as seed viability issues, shortages of proper propagation materials and failure of standard propagation techniques. In other words, many have always been in short supply.
*The poor economy has drastically cut nursery stock production at the private nurseries across the country, to a point where supply is now dropping below the level of demand.
*Multiple year production cycle for a specific crop of nursery stock to make it to market.
*Quickly changing market (driven by several outside influences), coupled with the long production cycle creates great over production on some items and under production of others.
* Nurseries are located in rural areas, without the protection of micro-climates formed by cities. Some plants can survive in these micro-climates, yet can't be produced locally in nurseries. They can be produced in areas of more mild temperatures. We can't grow what won't grow here.

Solutions to the current shortage of desired plant material:
* Patience, the private nurseries are always trying to accommodate their customers, it just takes time and money. 10 years ago, we sold lots of Ash and Emerald Queen Maple. Sales were so good we couldn't keep up. Almost overnight, the list of plants no longer included these trees and we were left with a drastically shrinking market to no market. Today, the demand for those trees have either disappeared or have been greatly reduced. It takes much less time to change a mind than a crop.
* Encourage growing contracts with end users or at least develop a static list of desired plants (or at least modified over a many year cycle).
* Create a board of private growers of nursery stock to consult with members of the DNR nursery program.

Proposed remedies which should be considered:
* The DNR should not get into the business of growing lining out landscape plants (native or other) for private nurseries or for sale to any private company or individual.
* The DNR should not be allowed to encourage the development of municipal nurseries or to offer lining out stock for those nurseries.
* Current DNR facilities should be made available for lease (similar to state park concession stands) by private nurseries or management companies.
* Over production should be destroyed and not sold at discounts or grown on for larger transplants

While going through the list of comments made earlier, it seems only 1 private nursery (Evergreen Nursery) was canvassed, several DNR employees or contractors and a few private land owners made up the bulk of the responses. The comments weighed heavily in the direction to expand the current nursery program to include larger trees and shrubs and container plants (understand that means small plants grown in tube trays). The private nursery suggested the DNR should not be in the production end of providing plants, but help to market the plants produced by private nurseries. They (DNR) should also be in partnership to research and educational endeavors, an area which private nurseries generally lack the funds, facilities and personnel to conduct.

Other item of interest:
The DNR nurseries should not be producing large replacement plants for transplanting in state parks. Parks should be strongly encouraged to collect wild trees and shrubs from their own property for replanting within park boundaries. Money would be saved in all areas of current production and distribution means. Local genetics would also be preserved.
Last word. Please do not encroach into what has been traditionally a private venture. Today many nurseries are struggling to stay alive. If the DNR would expand in this area, it could be the death of the private nursery industry in the State of WI.

Thank you,
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This may be done, already, but I would be interested in more attention being paid to seed provenance in distributing genetic material. Some effort could/should be made to mix native Wisconsin seed and seedlings from areas south of planting areas to bring these southern genotypes northward in anticipation of climate change (global warming) and the need for adaptability to higher temperatures within a species. There are, of course, lots of details involved with this, but any geneticist or silviculturalist could organize such a strategy. The tribes I work with do not want facilitated migration of species, but they are not opposed to using Wisconsin native species stock. To some extent, this mixing of genetic material should be occurring, anyway, since the "Great Cutover" may have depleted genetic diversity in some landscapes. I suspect such an effort could be organized with Minnesota and the federal government tree nurseries to save money. Thanks for the opportunity to comment and good luck with your program updates.

--
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Hi Carmen,

On page 9:


Comment FYI: The DNR has long had a native seed “farm” – first housed within ER but now run out of WM (Mark Martin, Harvey Halvorsen). I know that Scott Weber was actively producing native seed – particularly grasses out at Badger. Most of it is bid out, though, to the private sector. You can contact Mark Martin for details and information on the overall process. I can provide you with his contact information, if you’re interested.

Thanks,
Dawn

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Johnson’s Nursery Comments on the Recommendations for a Reforestation Program

The stated mission/purpose of the DNR’s Recommendations for a Reforestation Program are: to begin “exploring partnerships and identifying opportunities to support and improve reforestation projects in Wisconsin.” Johnson’s Nursery supports this mission and is willing to help with this effort with the understanding that the DNR supports our mission of selling trees commercially for profit.

We feel the DNR’s role of leading reforestation efforts in Wisconsin is a good one, though we think the bulk of their activity should be educational and research efforts and not direct sales of plants to the private end user. In particular, the education we’d like to see would be in the realm of the proper management of lands for reforestation and restoration. This could be very useful to both our forests and the Wisconsin nursery industry. It is certainly an area where partnerships between the state and industry could be formed. Johnson’s Nursery would be interested in supplying locally sourced native plant materials to help demonstrate successful woodland restoration. I’m sure other nurseries in the state would be interested in similar demonstrations.

As a major participant in the development of the NR 40 Invasive Species legislation in Wisconsin, our nursery has shown an ability to work with the DNR on improving and enhancing our states resources. We hope the department recognizes this contribution and as a result will consider our mission and not infringe on our ability to be able to sell trees commercially at a profit.

Respectfully submitted,

Chad Johnson—President
Tom Hill—Sales & Marketing Manager
Jeff Wolters—Wholesale Sales Manager (board member of the Urban Forestry Council)
Brent Gustason—Wholesale Sales (board member of the Wisconsin Nursery Association)
Michael Yanny—Senior Horticulturist (member of Woody Plant SAG for NR40 Invasive Species Council)
The following comments on the Division of Forestry's draft *Recommendations for Reforestation Program* are offered by Michael Luedeke, Spooner, WI 11/27/2013

1) Production of trees and shrubs and plant material
   - *Production of native species not currently available.* I support this recommendation only if it can be shown to be economically feasible and the costs to produce can be offset by revenue generated from sales of such new species stock. Do not shift costs to produce these new species to other existing nursery production operations. Is there sufficient demand for these new species to support a commitment to producing these species? Can such a commitment be defended especially when overall nursery sales/revenues have been declining? Has a demand survey been undertaken?
   - *Explore feasibility of producing containerized seedlings.* I support exploring this production option since there is a demand for such nursery stock currently in Wisconsin and such stock has been shown to be effective and cost competitive. Costs to produce such seedlings should be supported entirely by revenue generated by sales of containerized stock. Don’t spread costs to other bare root stock.
   - *Contracting to produce containerized seedlings AND leasing of state nursery facility.* I support these recommendations since production of most of the containerized product being used in Wisconsin is currently being done outside of Wisconsin. Lease state owned facilities to recover investments in nursery infrastructure, maintain nursery properties, and develop additional in state expertise in containerized production.
   - *Increase availability of tree & shrub seed.* I support only for species with sufficient demand to be feasible. I further believe seed sales should be done far enough in advance of collection so nursery staff can determine what quantities of seed have been pre-ordered so that sufficient seed can be purchased. This would be particularly important for perishable hardwood seed that typically cannot be stored beyond the year of collection. Cannot afford to purchase seed that will not be used or sold.
   - *Update seed purchasing policy.* I support updating the guidelines for ordering, purchasing, pricing, and handling of customer tree seed orders. Nursery operations and public lands in Wisconsin should receive priority for available seed.

2) Reforestation monitoring and research
   - *Evaluate unsuccessful natural forest regeneration.* This is a broad recommendation with little information on who will do such evaluations, where, and when. I’m not convinced that nursery staff has sufficient field level experience to effectively perform such field evaluations since this experience comes from evaluating regeneration in many natural stands and understanding the nuances of regional LTAs and local habitats. This should be focused better to target key forest types/species/habitats. Looks to be a time sink for nursery staff and perhaps better assigned to field staff who handled the field management activities that led up to the unsuccessful natural forest regeneration. Willing to support only as a low priority recommendation now until better focused.
   - *Develop forest regeneration strategies for public & private landowners.* Not enough information and my gut reaction is that this better belongs assigned to the property foresters, not nursery specialists. Low priority.
   - *Identify site conditions and species which are best suited for containerized & bare root seedlings.* I support but this needs to heavily involve field managers who have experience with using
3) Partnerships
- **Develop a Cooperative Tree Planter’s Program.** I support this recommendation since it has the potential to upgrade the performance of tree planting contractors, improve reforestation success, implement new reforestation techniques, and provide a feedback loop to the nursery program on reforestation issues.
- **Increase production of native grasses and forbs.** I support this program only IF this segment is self–supporting using non-forestry funding sources and is not subsidized by other nursery functions. Is there sufficient demand that cannot be met within the private sector native plant nurseries to implement this using state resources.
- **Work with private sector nurseries on urban & rural reforestation.** This recommendation appears to expand the Division’s role into urban landscaping production which is outside the purpose of the state nursery operations. I do not support.

4) Education and outreach projects
- I would like the nursery team to be responsible for maintaining and updating the recommended list of pesticides that support successful and economic reforestation efforts in Wisconsin. The nursery staff has significant experience with evaluating and using forestry pesticides.

5) Nursery Operations
- **Scale nursery facilities & operations to produce stock that meets demand.** I support this recommendation.
- **Improve seed processing & storage facilities.** I support this recommendation.
- **Seedling surcharge.** I support re-evaluation of the seedling surcharge, both the effectiveness and appropriateness of such surcharge. In the current state, the surcharge is disproportionately applied to conifers versus hardwood seedlings. Is the revenue that is collected used for other purposes beyond the original intent?
- **Development of a credit card option for payment.** I support this recommendation.
- **Evaluate the current Department’s practice for equipment chargebacks and pricing for stock.** I support this evaluation and hope this can be conducted by an independent group and not an internal agency study.
- **Work with the Bureau of facilities & Lands to evaluate the cost effectiveness of maintaining historic structures.** I support an evaluation with the hope that expenses for historic restoration & maintenance should not be charged against nursery production. I can understand maintenance of historic structures that provide regular public education but investments in restoration for non-essential buildings that are not routinely sought out by the public should be discontinued. We don’t have that luxury of sufficient public funds to maintain “all” historic buildings.
- I am adding here another recommendation that the Division evaluates the nursery production operations using the LEAN (Omega Six) manufacturing concepts. The LEAN strategy focuses on
production systems to identify changes to processes that can decrease cycle times, reduce investments in inventory, increase productivity of resources, increased utilization of capital equipment, improving flow of products, and improve value for customers. Current nursery production operation uses many steps, relies heavily on hand labor, locked into long time intervals, complex schedules, and specialized equipment. All of these areas have similarities to manufacturing systems used in the commercial business sector and which have benefitted from an evaluation using LEAN concepts. LEAN has been especially effective in improving systems with high manual labor inputs.
Hi Carmen: Just wanted to let you know that NHC reviewed and don't have any concerns. Thanks, Erin

Earlier this year, you had provided comments on the Nursery Program’s Request for Information (RFI). I appreciate the time and effort you put into providing those comments. I wanted to make sure that you were aware of the opportunity to comment on two items related to the State Nursery Program. I’ll give you a brief summary of both issues, but more detailed information can be found at the Proposed DNR Program Guidance web-page. Comments can be sent to me at carmen.hardin@wisconsin.gov and will be accepted until December 2, 2013.

Recommendations for a Reforestation Program
The first item is the Recommendations for a Reforestation Program, which is based on input received from the Nursery Program’s Request for Information (RFI) earlier. The Forestry Division’s Nursery Team also provided program analysis which help shape the recommendations. The proposed Reforestation Program is still grounded in the Nursery Program, but reflects a much broader program direction. The recommendations cover five core areas – production of seed and plant material, reforestation monitoring and research, partnerships, education and outreach, and nursery operations.

Seed Policy
The second item is the proposed Seed Policy which sets priorities and procedures for distribution and sales of hardwood and conifer seed from the State Nursery Program.

Updates on Public Comment Opportunities
Please note that there are four guidance documents related to forest management currently out for review. In April the Natural Resources board approved a new service which will increase transparency and public participation in the creation or revision of program guidance. Below is a link to subscribe to the service which will automatically notify you of guidance related to key words or subjects you identify (similar to Wisconsin Legislature’s Notification Service).

- [Subscribe to emails announcing when new guidance is available for comment](#).

If you have any questions regarding the Reforestation Program Recommendations or Seed Policy, please feel free to contact me. Thanks!

Carmen Hardin
Science Section Chief
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to evaluate how I did.

Find us on Facebook at: www.facebook.com/WIDNR
With the advent of Emerald Ash Borer in Wisconsin as well as the possibility of climate change, urban forest species and variety diversity has become an ever more important topic. I feel that the State Nurseries could be utilized in testing new candidates for urban forest diversification (street, park, conservancy and private landscape trees). Private nurseries are limited in their ability to test and market new, desirable urban trees. The State Nurseries could test new introductions and produce seedlings of the most promising new species and varieties to wholesale and retail nurseries for production and sale to municipalities and the public. I think this would be a very valuable public-private partnership. The way that the Forest Products Laboratory works with private industry could be a model for this new program.

Art Ode
Volunteer Municipal Forester
City of Bayfield, WI
November 19, 2013

Carmen Hardin
Forest Sciences Section Chief
Bureau of Forest Management
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Subject: Hayward Tree Nursery

Please be advised that at a meeting held on November 12, 2013, the Sawyer County Board of Supervisors approved by unanimous vote to submit to the Wisconsin Department of Natural Resources the following proposal for the utilization of the Hayward Tree Nursery:

To lease a portion of the property to Sawyer County:

1. To relocate the County Forestry Staff from the Court House to currently unoccupied office and garage buildings at the nursery. At present the County Forestry Staff is housed in a small office in the Court House and has no garage space in which to store off-road vehicles and vehicles used in the daily pursuit of business on the County Forest. In addition the Forestry Staff has no private space in which to perform office work or meet with potential customers.

2. To develop future business investment in a containerized seedling operation utilizing grant funding from the (WEDC) Wisconsin Economic Development Corporation and engaging in partnerships with other counties, private business entities, and tribal governments.

This would provide:

- Significant local employment opportunities.
- Lower seedling product transportation costs to the State, counties and private purchasers.
- Reduced susceptibility of supply interruption due to insect or disease quarantines on seedlings now imported from Canada.
- Seedlings most suited to Wisconsin Forestry operations.
- Incentive for reforestation of Wisconsin public and private of private forests.
- Significant investment in infrastructure in the County.

It is the belief of the Sawyer County Board of Supervisors that the Hayward Tree Nursery needs to be fully utilized to provide for the maximum economic benefit of the County, the region, and the State of Wisconsin.

Kris Mayberry
Sawyer County Clerk

copy: Bayfield, Burnett, Douglas, Price, Rusk, and Washburn Forest Administrators; Lac Courte Oreilles Tribal Governing Board; Sawyer County's representatives in the Wisconsin Legislature; County Board members; Ken Maki; Ariga Grigoryan; and file
Hi Carmen,

I just saw the opportunity in “The Resource” newsletter to comment on the Division’s reforestation guidance document so I thought I’d take this chance to share some quick thoughts on behalf of the Wisconsin Bird Conservation Initiative:

- **Oaks for urban/suburban stopover habitat:** the decline of oaks, especially in southern Wisconsin, is a big concern for birds and bird conservation. I see some opportunity for the Division’s nursery and urban forestry programs to promote more planting of oaks, particularly to replace ashes as EAB advances. Oaks planted in urban/suburban settings aren’t subject to such severe challenges (excessive deer browse, mesophytic competition; invasives, etc.) as natural regeneration or planted oaks in forested settings. I realize that oaks are slow-growing, large trees and may not be suitable for every application, but they are a fantastic wildlife resource, not just for their acorns but also because of the highly diverse and abundant lepidopteran insect fauna they host (more so than other tree genera), which represents a critical food resource for our neotropical migrating birds in the spring. Urban/suburban forests can really contribute to this sort of stopover habitat. I think there could be some good synergy for both birds and forestry in sponsoring oak planting and emphasizing the importance of oaks in outreach and education.

- **Oaks for breeding habitat:** oaks (particularly those in the white oak group) are hugely important to our priority forest breeding birds in the south. The WBCI Southern Forests Committee would welcome increased research and monitoring into the most successful and cost-effective ways to utilize plantings (reforestation/afforestation within suitable landscape context, supplement to natural regeneration, etc.) as a tool to help maintain/increase abundance of oaks in natural forest settings.

- **Opportunity for partnership:** The Bird City Wisconsin program ([http://www.birdcitywisconsin.org](http://www.birdcitywisconsin.org)) provides a great avenue for a birds-forestry partnership in urban/suburban settings. In fact, our WBCI coordinator had already initiated a dialogue with Pat Murphy before he took a different job (see attached email string). I see a lot of untapped potential here. Our Bird City Wisconsin Summit, coming up in early 2014, could be the perfect opportunity to make some connections.

- **Beyond trees?** Do the state nurseries also work with shrubs? Native fruiting shrubs (maple-leaved viburnum, serviceberry, etc.) are an important food resource for migrants, especially in the fall. This could be another avenue for targeting products/outreach/education to land managers/landowners interested in providing stopover habitat, managing for migrating birds, native landscaping, etc.

Please let me know if you have any questions. I’ve copied a couple of other WBCI folks on this message: Ryan Brady, our Monitoring Coordinator, and Carl Schwartz, our Bird City Wisconsin Coordinator.
Thanks and best regards,
Yoyi

__________________________________
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Customer service is important to us. Please tell us how we are doing.
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This letter is from Wisconsin County Forests Association (WCFA) to Carmen Hardin, Science Section Chief at WDNR Division of Forestry. The letter discusses proposed DNR program guidance on Recommendations for a Reforestation Program and Seed Policy.

WCFA represents the interests of 29 county forests established under state statutes §28.10 and §28.11. Collectively, their member counties manage nearly 2.4 million acres of forests, the largest public ownership in the state.

The letter highlights the decline in the purchase of bare root seedlings by county forests in recent history. The association supports diversification efforts outlined in WDNR's Recommendations for a Reforestation Program and encourages WDNR to pursue production of nursery stock that better meets today's demands through any means possible. They are willing to work with WDNR to accomplish programmatic changes addressing current and possible future reforestation demands. They strongly encourage production of containerized nursery stock, supported in some fashion by WDNR, to meet growing demand in a competitive manner.

Regarding the proposed State Nursery Program Seed Policy, the letter states that it is extremely important for WDNR Division of Forestry to provide seed from a local source to county forests for direct seeding projects and also to commercial growers providing containerized growing stock on their FSC and SFI certified forest lands. The distribution priorities outlined in the proposed policy seem reasonable. However, they encourage WDNR to consider increasing seed production, if necessary, in order to meet demands of our reforestation efforts including containerized seedlings produced for county forests by private entities.

If further assistance is needed as WDNR moves forward with changes to the State Nursery Program, the association asks not to hesitate to consider them as partners in working toward solutions. They thank the opportunity to provide this input.

Sincerely,

Elroy Zemke, President
Wisconsin County Forests Association

Jane Severt, Executive Director
Wisconsin County Forests Association
Hi Carmen,

Hope things are well with you and that you have a great Thanksgiving.

Here’s my comments on the guidance doc:

You state, “Having economically priced seeding can help achieve increasing the amount of forestland, connecting fragmented forest parcels, and economically producing forest products.”

My simple comment on this is that it’s not the price or quality of trees that matters, in the big picture it’s all about property taxes.

Plant trees and see your taxes go up? It’s that simple. Sure there are other reasons like CRP not being as attractive but that’s not as important as the fact there’s a huge discrepancy between forest land taxes and other uses. And with the new MFL rate being $11/acre there is absolutely no way anyone can plant trees with the intent of doing it as a business.

Finally, it would be nice to see the department acknowledge that issue rather than simply avoiding it. Perhaps you could include language in the statement below.

In contrast, tree plantings have declined in the state due to a number of factors, including changes in industrial forest ownership, the economic downturn, shifting landowner objectives, and reductions in federal cost-share programs, AND A PROPERTY TAX SYSTEM THAT DISCOURAGES PLANTING OF TREES.

Thanks for considering these comments.

Richard Wedepohl
Dear Carmen,

I have just read through the “Recommendations for a Reforestation Program” via the DNR website. I will follow their outline as I address my concerns and questions.

Executive Summary
There is a recommendation for statutory changes. What changes might there be? How would those possible changes affect the private sector, and shouldn’t we know what they are and given a chance to voice our opinion before they are passed?

Introduction
1. I found all the information on the history of the state nursery program interesting and agree that the state nurseries have done a great job. Regardless, I do not share the belief that we need to continue the state nurseries growing tree seedlings for a customer base of landowners with 1 to 9 acres of land, or to those with 50 acres. The smaller landowner market (as per the state agreement with the private sector) has been left for us to provide trees for. If this is one of the suggested statute changes, I vehemently oppose.

2. Economically priced seedlings? Based on the state nurseries production costs in the past, growing seedlings at a loss is not economical to the tax payers of Wisconsin.

3. I also found it extremely interesting that though the average family forest parcel has declined, the number of cooperating consulting foresters has increased over 250%. I truly appreciate our state foresters and would like them to work with the private sector as closely as they do with the state nurseries.

4. All the reasons mentioned regarding the decline in tree planting has affected the private sector even more than it has the state nurseries. We aren’t getting paid by the hour, nor do we have a state pension or state retirement plan, or paid for health insurance. So should we close our doors so the state nurseries can monopolize an already shrinking market? We should not have to compete for the 73% nursery orders that the state nurseries claim from the small private land owner. The private sector nursery relies on those customers to continue our family farms.

Division of Forestry’s Role
The statement in the 2nd paragraph “Production at the state nurseries is scaled to reflect changing seedling demands and production costs which is then balanced against private sector capacity”. How will the balance with the private sector be determined? We had trees that we destroyed for lack of sales. Why? Perhaps because 73% of state nursery orders and 67% of the seedlings purchased has been from what should be the private sector’s customer base, the small land owner. The state nurseries SHOULD NOT BE SELLING TREES at minimum orders of 1000, 500, or packets of 300, as per agreement made between the state nurseries and the private sector nurseries.

Recommendations
Partnership opportunities? Why would the private sector want to contract to sell trees to the state nurseries so they can sell our trees to what should be our customers? How can I make further comments on changes in
partnership opportunities or statutory changes without knowing what they are? Please, at least give the private nurseries more information before continuing on this path.

**Nursery Operations**

1. Seedling production based on combined private sector capacity should in itself reduce state nurseries production by 67%.
2. What statutory changes on seedling surcharge? What is the seedling surcharge and what is it used for?

**Appendix 1: Summary of RFI Comments**

I would like to express my disappointment that the RFI comments were taken during harvest time – March 28th, 2013 through May 9th, 2013 – the busiest time of the year for bare root nurseries, and that few private nurseries even knew anything about it. I believe the fact that only two comments from the private sector reflect that. Furthermore, half of the comments – twelve, are from the DNR employees, which may be somewhat biased on the state nurseries behalf. I do request a copy of the full comments as your system is not user friendly.

In closing, Carmen, please consider holding off any decisions to implement changes until this is allowed to be fairly evaluated by more of the private sector nurseries that will be impacted. Thank you in advance for your time and efforts to consider the needs of the private sector nurseries as well as that of the state nurseries.

Best regards,

Beatrice Wheeler
December 2, 2013

Carmen Hardin
Science Section Chief
Bureau of Forest Management
Division of Forestry
Wisconsin Department of Natural Resources

RE: Public Comment: Future of State Nurseries, Partnerships Proposed with Private nurseries

The Wisconsin Nursery Association values the environmental work charged to the WDNR and has served for many years as a partner in efforts by the agency and state to improve our state’s environment. As the association representing the private nursery industry in Wisconsin, we are charged with advocating on our industry members behalf.

The industry and association continues to be interested and willing to “partner” with the WDNR for the benefit of our private nurseries; however, the state nurseries do operate in direct competition with private nurseries and private enterprise by producing and selling seedlings to the public for use on private lands. Our association supports the DNR’s reforestation efforts, specifically the production of seedlings for use on public-owned lands.

The state is not only competing directly with private nurseries, but also competing under a business model that is unfair to private industry. The state nursery program’s model is to operate at break even, whereas the private sector operates for profit. This creates unfair competition in the marketplace and the private sector nurseries are at a distinct disadvantage.

Supply will meet demand if the demand exists, but since in many cases the supply of seedlings is offered by the state to the public at prices in many cases below that at which private nurseries can compete, we have lost seedling nursery production in the state’s private nursery industry. Thus, the private sector may not be growing seedlings specifically specified for projects and programs administered by WDNR, e.g. native species seedlings.

The state nursery program has evolved over the years from its inception in the early 1900’s. The state nursery program’s request for information and the guidance document produced is an indication that the program is seeking to continue its existence, or survival. We agree that programs such as the WDNR State Nursery Program must be evaluated periodically and make changes for improvement.
If the state nursery program is to continue operating and selling to the private sector, we encourage the WDNR to seek out partnerships with the private sector nurseries for production of seedlings and other plants for sale to the public. Our association is willing to assist in these efforts and in providing a voice and a communication link for our members.

Thank you.

Wisconsin Nursery Association

Brian Swingle
Executive Director
Carmen,

I copied text from your guidance document and placed my comments within it. Pat Murphy suggested I provide comments to this document. I thank her too for her steadfast support at exploring and potentially building this mutually important partnership. Thanks for the opportunity to comment.

Harvey

Partnerships
Building on existing partnerships and developing new ones allows the Program to address emerging reforestation issues, which in turn helps the forestry community as whole. Current partnerships include providing a list of businesses (Comment 1) that provide tree and shrub stock, site preparation services, and tree planting services to private landowners, offering park stock to the WDNR Bureau of Parks, providing seedlings to state lands, and supporting county forest reforestation projects with a 50% price reduction of bare-root nursery stock.

The Program recommends continuing these associations and building new partnerships in this area to include:

- Investigate creating a Cooperative Tree Planter Program, similar to the Cooperative Consulting Forester Program, with a goal of increasing services in counties that currently lack them.

- Explore production of native grass and forbs species for restoration projects (Comment 2) with Bureau of Wildlife Management, WI Department of Transportation, US Army Corps of Engineers, US Fish and Wildlife Service, and others. The focus (Comment 3) is on species not currently readily available from private sector.

Comment 1: The Bureau of Wildlife Management (BWM) has similar history building partnerships for landscape-scale ecosystem management. The BWM developed partnerships with businesses and local NRCS offices during peak CRP signups. This was a very successful DNR private lands model. We networked with agencies and landowners who needed technical information and assistance for planting native prairie grasses and forbs. In fact, we also partnered with Forestry personnel during these technical training sessions to highlight important reforestation and prairie restoration plantings based on pre-settlement vegetation patterns.
Comment 2: Nursery-produced prairie seed would be for restorations on public lands projects, or on those lands purchased by non-profit government organizations (NGO’s) via the state of Wisconsin Stewardship Funds.

Comment 3: Focus will be on the production of: a) native genotype prairie species of Wisconsin origin, b) uncommon, rare, or endangered species that require specific habitats or c) those not normally available from Wisconsin-sourced private vendors.

Education and Outreach Projects
Education and outreach projects include the annual 4th grader free seedling program, (Comment 4) seedlings for registered community forests and school forests, demonstration projects, web-pages, videos, and open houses. These projects highlight the benefits trees provide, including clean air and water, wildlife habitat, shoreline protection, and forest products.

Comment 4: This effective outreach opportunity can easily include a prairie theme too. It would be a strategic way to introduce 4th graders to our forestry and prairie heritages. Free prairie seed, or free containerized stock from the Hayward Nursery could be distributed to schools or community prairies. Wow! The potential for holistic ecosystem management featuring diverse habitats comes alive to 4th graders across Wisconsin!! ☺
Hi Carmen. I wanted to send in some comments for the use of DNR state nurseries.

The Wisconsin Urban Forestry (UF) Council has several “issues groups.” One of those is the “Diversity Group” which I sit in on. They are tasked with helping diversify the Urban Forest. They were brainstorming some ideas on how to help accomplish this at last week’s UF Council meeting. DNR state nurseries came up in terms of - could they help – if so, how. (Just so you know, the WI Nursery Association representative was not present for this issues group discussion.) I know very little about the DNR Nursery mission and issues, said so, and followed up with an email link to the “Proposed Recommendations for a Reforestation Program” letting them know there is a comment period.

Urban Forestry’s main outcome in the strategic direction is increasing UF canopy. There are a multitude of ways DNR nurseries could assist with this. Below, I’m expanding on some of the ideas discussed by the UF Council Diversity group as well as including some of my own.

- Have the DNR nurseries be a research tool for UF trees. Grow and test trees for cold hardiness. Perhaps grow stock for University partners to conduct research testing. Trees could even be transplanted into real-life situations in communities for the final round of their testing life. Does this need to be native only? What about seedless or other varieties of natives? Hopefully this could expand beyond just natives b/c trees are grown for research purposes.
- DNR nurseries could be used to help train local governments who have nurseries, how to properly maintain them. Perhaps they could be used to demonstrate how to start a nursery for those who are interested in starting one, but haven’t yet done so.
- Trees and shrubs could be grown for municipal give-away programs involving residents. Stock should be grown until it’s a year or two younger than what is available at commercial nurseries. This stock would be available to local governments who have a program where they distribute this stock to residents for planting on private property. Education and outreach could be a required piece of the program. This helps meet UF Strategic Direction goals of increasing canopy and E&O. Increasing canopy on private property is one of the most difficult goals to reach. There are millions of private property owners in Wisconsin’s urban areas.
- DNR Nurseries could grow stock specifically for municipalities through a MOA. Getting there would be a multi-year task. The first year could entail DNR Nurseries piloting growing stock to the size needed by municipalities (~1 to 1.75” caliper bare root.) The next couple years would entail pursuing changes to WI state statute and administrative code to make this possible. Municipalities have a difficult time finding quality stock of slower growing species in the quantity they need. I’ve heard about this problem repeatedly for the 9 years I’ve been with the DNR UF Program.

If you have questions or need clarification about what’s written above, please give me a call. Thank you for the consideration Carmen.

Olivia Witthun
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Public Comment on WDNR’s November 1, 2013

“Recommendations for a Reforestation Program”

December 2, 2013

Linda Zillmer
902 Holly Hill Lane
Birchwood, WI 54817   Washburn County

Summary:
The WDNR should maintain all its existing nursery locations. It is important to have multiple locations, not only for coverage of the different climate and soil types across Wisconsin, but also to manage for risk of loss from pests, disease and events of nature (tornados). Multiple locations also better serve the logistics for distribution. The WDNR and state agencies should manage the operations of the nursery locations in the public interest. Individual local units of government, not for profits or corporations should not be in the position of determining policy or operating the state nurseries.

Tree stock should be grown for maintaining and improving native species, research purposes, re-forestation of public lands and for private landowners unable to obtain trees at the same scale as industrial forestry operations. Bare root stock is still a viable and often preferred means of reforesting. The state nurseries should look to maintain and improve its bare root stock production. The state nurseries should not invest in containerized operations. Large scale containerized operations should be developed by private industry and that market should support itself. Just as the state nursery program should not seek to compete with private nurseries, the state nursery program should not be used as a low or no cost advantage for some industrial forestry corporations.

PRODUCTION OF TREE AND SHRUB SEED AND PLANT MATERIAL
The program should focus on native species. Feasibility of containerized trays may be tested at the state facilities. The state program should not include contracting with private nurseries to determine feasibility or to grow stock. The state should not lease facilities to private or local government entities. The program should look at patterns of ownership, development, climate, environment and industry factors to determine production for future needs for forests and forestry products. The species and quantities of species production should meet not just short term, but also long term objectives.

REFORESTATION MONITORING AND RESEARCH
The program should look at past history and existing and potential customers to determine future demands. Why are county forests not replanting? What are the reforestation projections for public forests? How can non-industrial scale forest owners better utilize nursery stock in managing their lands? Policy recommendations to encourage reforestation should be developed.
Public lands, especially, should be monitored for reforestation. Educational partnerships with public universities should provide recommendations for improved reforestation methods.

**PARTNERSHIPS**
The reforestation program should be a state program and serve the public interest. Experimental projects in partnership with public universities would be appropriate. Local governments or private interests should not manage or control the state’s reforestation program or the operations of any of its nursery locations. Exploring partnerships with agricultural and environmental groups may provide additional guidance and opportunities to utilize nursery stock.

**EDUCATION AND OUTREACH PROJECTS**
As a state program, public education and outreach projects would some of the services provided to the public in support of reforestation objectives.

**NURSERY OPERATIONS**
Evaluations of nursery operations should be made by an independent source to determine whether there are more effective or efficient processes and whether the products being delivered are in good condition and available when needed.

Thank you for considering this public input.