

Response to Comments

The Division of Forestry invited stakeholders, the public, and staff to review and provide input on our Draft Strategic Direction (SD) from January 25-February 25, 2022. Thank you for taking the time to review and provide feedback. Your contributions to Wisconsin forestry and the input you provided are greatly valued.

We use our SD to define our niche within the broader statewide and national forestry community and to plan for the future so that we can: (1) maximize the value delivered to the people of Wisconsin, (2) efficiently use available resources and collective capacity and (3) adapt to new and emerging opportunities and challenges.

In total, 99 people/groups commented, and numerous verbal comments were provided through meetings or other forums. The Division of Forestry's Strategic Leadership Team (SLT) reviewed all the comments received and modified parts of the SD based on the feedback. What follows is a summary of the comments that were submitted, organized by theme, along with the SLT's response to each theme. Please note that every comment did not result in a modification to the SD. In some cases, comments were conflicting or at odds with each other. In addition, some suggested revisions were not consistent with SLT's intent, our role, or would have broader implications, so SLT chose to retain the original direction. Other comments were more operational in scope and will be considered at a future date or during implementation. This document describes any modifications to the draft SD or actions that the division will take to address issues and concerns that were raised during the comment period.

This document is written in first person, from the perspective of the Division of Forestry's SLT.

Next Steps

We will revise the draft SD and share the final document in July 2022. Over the coming months, we will also start to finalize performance measures. We use outcome-based performance measures to monitor accomplishments, identify needs, and adapt accordingly. Performance measures will be shared in quarter one of Fiscal Year 2023.

The process to align our workforce and our management systems with this SD will not be completed all at once. Implementation will occur over time, with some shifts implemented immediately and others as opportunities arise. SLT is committed to minimizing the impact to staff and our critical operations as much as possible.

One aspect of the SD that will be implemented on a specific date is the organizational structure. We intend to shift to the new organizational structure at the beginning of the next fiscal year, July 1, 2022. Other changes, such as administrative efficiencies and shifts in focus, will gradually be phased in over the next three years so that we will be able to meet the intent of the Strategic Direction within five years.

Summary of Modifications and Clarification Made

The list below identifies items within the SD that will be modified or clarified based on input received. More information on each change is included in the response to comments below.

- Climate change emphasis
- Addition to challenges and opportunities in "The Road Ahead"
- Conversion of Silviculturist to Geneticist position
- Year-round dispatch model
- Prescribed burning
- Wildland Urban Interface program
- County Forest program
- Private Forestry program priorities
- Landowner engagement continuum
- Conversion of Tax Law Forestry Specialists to Administration Specialists
- Role of Private Forestry Outreach Specialist in Tax Law Communications
- Area Forestry Staff Specialists

General Comments

Theme: Edits and suggestions for clarifications

Response: Where editorial changes or clarifications were suggested, they will be incorporated.

Theme: Partners working together to accomplish forestry goals

Several partners expressed a desire to work with the division on shared goals, while a few commentors also expressed concern over the amount of work the division is taking on versus the role of other members of the forestry community.

Response: Working alongside our partners has always been, and will continue to be, a critical foundation of how the division operates. In fact, this is why the purpose statement for the division stresses accomplishing our purpose *in partnership* with others in the forestry community.

The strategic planning process is about taking the goals identified in Wisconsin's State Forest Action Plan and looking internally at our niche and what is achievable with the resources that we have. Within the Strategic Direction document, each program's role statement describes our niche within the larger forestry community. The division's process will always consider partnerships and seek collaboration as we plan. Often, our niche involves a partnership to accomplish the direction we want to take. The strategies and tactics are not intended to specifically state how much work will be accomplished by the division or with a partner. Work will be measured through our performance measures and other metrics.

Theme: The Road Ahead

We received a comment on the challenges and opportunities highlighted in this section, requesting additional emphasis on sustainable forest management and markets.

Response: Originally, we did not include themes speaking to more general challenges and opportunities that are covered in our division's purpose statement. However, upon revisiting this section we decided that there is a benefit to highlighting the challenges and opportunities we face around maintaining healthy and resilient forests, and the local communities and economies that depend upon them.

Healthy forests help support Wisconsin's forest-based industries and the local economies that depend on them. The division needs to ensure that our work is contributing to ensuring healthy and resilient forests across Wisconsin. We recognize that many forestry-oriented communities and businesses have been challenged over the last several years, dealing with mill closures, pandemic impacts, and increased costs of operation.

Theme: Emphasis on climate change

Multiple commentors expressed support for the division's focus on climate change, requesting more explicit emphasis on the role the division will take. Additionally, some commentors expressed a desire for the division to own a greater leadership role in the state in climate change work and initiatives.

Response: We will update the climate change section of the document to better capture the work the division will be focusing on in this area over the next 5 years (and beyond).

The division's focus is to further the goals described in Wisconsin's State Forest Action Plan – to ensure that Wisconsin's forests are resilient and adaptable to future conditions and that carbon storage in forests and forest products is increased. Over the next five years, the division will focus on both climate

mitigation and adaptation initiatives. The Department's niche in this arena is to support related research efforts and translating findings from the science to the application for land managers. In addition, the division has a role in assisting in the implementation of activities, such as providing technical and financial assistance to communities and landowners to aid in tree planting efforts, recognizing that the commitment begins before a tree is planted and continues over the life of the tree. In addition, the Division has a role in policy analysis, strategy development, and supporting partnerships on new and emerging topics such as carbon credit programs and carbon storage in wood products.

Comments on Applied Forestry

Theme: Conversion of Forest Silviculturist position to Forest Geneticist

While the majority of those that commented on this strategy to convert a Forest Silviculturist to a Forest Geneticist expressed support for increased investment in genetics work, many also expressed concern over loss of a silviculture position, specifically related to loss of support and capacity to accomplish the needed workload.

Response: Based on the information received through comments and a subsequent exploration into alternatives, we will not be reallocating a silviculturist. The division will retain 3 silviculturist positions, and we will seek a new federally funded position to allow for a new geneticist position. The associated strategy and tactic within the Strategic Direction document will be updated to reflect our intent to invest in a forest geneticist/ecologist position.

Theme: Investment in Forest Health

We received some feedback identifying concern with the lack of increased investment in Forest Health, especially in light of increased challenges with invasives and diseases.

Response: In our SD, we are not increasing investment in the Forest Health program staffing at this time. If resources were not limited, there are many areas of all of our programs in which we would like to grow. However, we feel that this program is operating efficiently and effectively within its current capacity. If resources do become available, we will utilize that funding in a manner consistent with the goals of Wisconsin's State Forest Action Plan and the Division's SD.

Even without increasing staffing in this program, our investment in forest health practices remains a top priority and is increasing in the following ways:

- Our increased focus on climate change has direct connection to invasives and diseases.
- We are increasing the priority of more holistic forest management on state forests, which includes forest health practices.
- Our Wisconsin Forest Landowner Grant Program's (WFLGP) most funded activities are around invasive species management.
- We continually seek federal funds to increase capacity and collaborate with partners to accomplish more projects at a greater scale.

Theme: Forest Products Team investigation of new and emerging markets

Largely, commentors who discussed this strategy support this direction; however, several commentors also expressed a need to focus and provide more direct assistance where markets are limited.

Response: We affirm the decision to have the Forest Products team expand investigation of new and emerging markets. The Forest Products team will continue to provide technical and other assistance

supporting forest-based industries with adopting new technologies, exploring new markets, and diversifying forest products and services.

Theme: Conversion of Hayward Foreman to Tree Improvement Specialist

While all staff and partner comments received on this topic supported the addition of a Tree Improvement Specialist, one commentor supported investment in tree improvement but is concerned about the loss of the Hayward Foreman position's role maintaining facility oversight.

Response: The Tree Improvement Specialist will continue to provide facility oversight as provided by the Hayward Foreman. In addition, Limited Term Employees or contractors will be used to fulfill basic facility maintenance needs, such as lawn mowing, snow plowing, and other tasks.

Comments on Forestry Business Services

Theme: Reallocation of Flambeau River State Forest Financial Specialist

The comments that were submitted related to the reallocation of the Flambeau River State Forest Financial Specialist discussed the workload of this position and concern over how that workload will be covered if the position no longer exists.

Response: The reallocation of a position is not a decision we take lightly. All of our staff provide value to the division. With limited resources and new priority work, we had to make the tough decision to reallocate this position. Based on the comments received, we worked with the Budgets and Grants Section staff to clarify how this workload will be absorbed by section staff, Area Forestry Staff Specialists (AFSS), and in field forester work. Additionally, some of the duties currently being covered by this position are a result of a long-term vacancy in the Property Management position; other roles will be transferred over to the Bureau of Parks and Recreation as a result of the department's 2016 Strategic Alignment.

We are committed to continually evaluating the impacts of this change and adjusting as needed. The Budgets and Grants section will continue to support staff in accomplishing their financial work under a modified model. This will include continuing to provide subject matter expertise in WisFIRS financials, evaluating our county and state audit programs and focusing on the financial aspects of these audits, continuing support of the NHAL timber sale program, processing accounts payables (invoices), supporting specialized grants, and enhanced budget and capital development services.

Comments on Forestry Field Operations

Theme: Fire Program Review

Several commentors expressed concern that the 2011 Wildland Fire Program Assessment, a detailed evaluation of the division's wildland fire program, was not revisited prior to the development of the draft Strategic Direction.

Response: Ahead of the process to develop the SD for FY23-27, we decided to hold off on a complete Wildland Fire program assessment. A couple reasons for this are that it is a large investment (time and resources), and we are comfortable with the current fire risk evaluation and investment levels.

The evaluation of the program for this SD included work planning data, time standards, time coding, and historical averages.

As stated in the SD, we will conduct a more comprehensive review of the Wildland Fire program within the next five years to ensure we are aligned with any changes in program needs.

Theme: Year-Round Dispatching Model

While the majority of commentors who touched on the dispatching model expressed concern on the proposed year-round dispatching model, citing implementation concerns (location, priorities, etc.) and questioning the need with our current protocols in place, a few commentors expressed support for the proposed model.

Response: After considering all of the comments received, we will not move forward with a year-round dispatching model at this time. While a year-round dispatching model would provide increased coverage it does come with some investment and logistical challenges. Our current dispatch model and working alone policy have been meeting our needs.

Theme: Wildland Urban Interface (WUI)

We received some feedback highlighting concern that our WUI program is not prominent enough within the document.

Response: In the draft, WUI is included under Fire Prevention, and commitment to continue implementing the new WUI strategy is included in the context/description text. We will be changing the name of this section to “Fire Prevention and Wildland Urban Interface,” to clearly indicate the significance of this program and ensure it isn’t lost within the text.

Theme: Adjusting implementation of the prescribed burn program

While several of the commentors who discussed prescribed fire expressed concern with the current level of investment, citing a desire to either increase or decrease our investment in prescribed fire both within the division and statewide. A similar number of commentors supported the proposal to codify the investment in Fish, Wildlife and Parks (FWP) division burns and work in partnership to achieve greater statewide capacity.

Response: As part of the department’s 2016 Strategic Alignment decisions, the division became the central administrator for all departmental prescribed burn activities. This includes work planning, performance accountability and record maintenance. This change reduced duplication of effort between the Forestry division and the FWP division in terms of equipment, training and qualifications.

Resources from both divisions are allocated to accomplish high-priority burns. As part of this decision, resources were allocated to the Division of Forestry for priority FWP prescribed fire work on state-owned lands. In our Strategic Direction, we reaffirm this commitment to FWP priority burns.

This committed investment is cross-division work and is not centered around forest management priorities. Silviculture burns on state and county forests remain division priorities and are above and beyond this commitment to FWP priority burns. Forest management using prescribed burning is accounted for within our division workload priorities.

Theme: Exploring opportunities to expand state-wide burning capacity

Several commentors supported this strategy and the effort to work in partnership to achieve greater statewide capacity. One commentor identified a need to expand the timeframe in which prescribed burning can occur.

Response: Exploring the expansion of prescribed burning into the growing season is already underway and is important to the division and department. The traditional spring prescribed burning season

overlaps with the time of highest forest fire risk, leading to prescription constraints needed to safely conduct and administer prescribed burns. In addition, expanding burns into the growing season can better achieve burn objectives in certain habitats, improving the long-term effectiveness.

We will add a tactic under the strategy of “Explore opportunities to support the expansion of state-wide prescribed burning capacity,” that identifies our continued efforts to determine how we can effectively continue prescribed burning into the growing season.

Theme: Increase in regeneration, afforestation, and cultural practices work on public forests

While many commentors on this topic expressed support for a more holistic approach to forest management on public lands through an increase in regeneration, afforestation, and cultural practices work, others identified concerns over how this will be implemented such as capacity and unknowns around what this work actually looks like in terms of amount and location.

Response: Our discussion around these comments focused on how this shift will be implemented and particularly around contracting and work planning for non-commercial practices. The implementation of this strategy will be planned by the Public Lands Specialist Team and monitored by the Field Implementation Team (FIT).

The annual capacity for non-commercial practices is determined through our work planning process. Some years may have more capacity than others, and the process of defining what this work is and how much is out there will be iterative.

We will continue the use contracting as a tool to accomplish this strategy. Contracting is an option for us in much of our state lands management work, as it is in timber sale establishment. The language in the document around this tactic will be modified to make our intent clearer.

Theme: Promoting and supporting the County Forest Program

Several commentors on this topic supported the promotion of the program, and at the same time commentors cited some concern around growing the County Forest program without growing the division’s capacity to support the program.

Response: The County Forest program is a significant contributor to sustainable forestry across the state, and all the benefits associated with that. We will continue to engage with the Wisconsin County Forests Association (WCFA) to help us determine how to allocate and scale the resources available within the Division to the County Forest program. As the County Forest program grows, the Division continues to seek and share opportunities, both from within the Department and from external sources, to further support the goals of the County Forest program.

We will be editing the direction statement for the County Forest program to clarify that we will continue to support Wisconsin’s County Forest program through our time standard hour commitment, grants, aids, and loans; ensuring the division is providing a strategic suite of services and supporting expansion of the County Forest program where opportunities exist.

Theme: Good Neighbor Authority (GNA) model

While many commentors who touched on GNA expressed support for the proposed GNA model and increased transparency in workload, there were also several commentors who questioned the investment in GNA, highlighting some confusion around our current investment compared to the proposed investment.

Response: The purpose of overtly calling out GNA workload and priorities within our SD is to more accurately describe and account for the work we are currently doing. This new implementation model for GNA will allow us to 1) focus this work within specific, targeted positions and 2) assign timber and restoration project responsibilities to staff working in the program. The investment described in the SD mirrors by in large what the division has already been investing in the program from a time analysis perspective. By formalizing this investment, we are able to provide more predictability and set clearer expectations and priorities for our staff, and more accurately plan for this workload alongside other priorities.

Theme: Focusing on priorities as defined in Administrative Code to help keep the private forestry workload in check

General support for this strategy was expressed by commentors. However, several comments expressed concern over how this will be implemented, citing concerns on the impact to both the type of work we do and amount of work. Additionally, some commentors cited concern with potential conflicts between Administrative Code and other division priorities (ex. tree planting and moving landowners along the continuum of engagement).

Response: Private forestry is an area that we can always do more in, and it can be difficult to determine where to stop. By relying more heavily on the sideboards set in Administrative Code, we can set the intended level of investment and then create space for local demand and capacity to define what occurs in any given fiscal year.

Administrative code does not limit the division to the activities identified, or mandate an order that activities should be completed in. Other private forestry activities that are considered division or department priorities can also rise to the top. Additionally, the nature of this work being driven by customer request will require us to be flexible. Our annual work planning will help us set priorities and determine annual capacity.

Based on feedback and discussions with staff in the division, we will clarify the SD language to better clarify that the intent is to help prioritize and focus private forestry work and not to limit work from other program, division, or department priorities.

Theme: Working to help private forest landowners move along the landowner engagement continuum to completing active management on their properties

Many of the comments received related to this topic expressed support for the division further helping landowners move towards active management, with caution on where the division's role ends and questions around the current initiative for 20,000 landowner walkthroughs. Several commentors cited concern with how this will be implemented and the impact on workload, especially with the fact that first-time walkthroughs will continue to be part of the private forestry workload.

Response: Many private forestry partners have a significant role in the important work of engaging private landowners and supporting them in achieving their management goals. As we shift to the next

five years, we thought about the right role for the division within this larger effort, resulting in our shifted strategy to not just focus on new landowners, but help engaged landowners move towards active management.

The division has invested significant resources and time in our current initiative to complete 20,000 new landowner walkthroughs. This remains an important goal for the division and partners. We will continue to work towards this goal, but will cut back on active outreach, and rely more on first-time landowners reaching out to us. Serving new landowners will remain a considerable workload, even without the active outreach. However, we believe a focus on management goals will reduce the workload and, in combination with the clear focus in priority work, will allow for time to help landowners move along the continuum—beyond their first walkthrough.

Additionally, as landowners move along the continuum, the need for active outreach will decrease and the division will take on more of a facilitation role—connecting landowners to private forestry consultants and organizations. We will continue to rely on work planning to identify annual capacity that acknowledges vacancies and changes in workload demand.

Theme: Private Forestry Education and Outreach Specialist supports Tax Law communications

Response: As we revisited the Tax Law program in discussion on reconnaissance and administrative work, we also revisited the associated recommendations that came in earlier in the process to determine any alternatives. During this evaluation, we saw a way to increase communications capacity. In the SD recommendations, the Tax Law team identified benefits of increased investment in communications to increase landowner, staff, and partner knowledge and understanding of program requirements and responsibilities. By increasing communications capacity into one coordinated position, some workload will be alleviated from the tax law specialists. While this is likely not a significant workload reduction, it does have other benefits, including a more holistic and consistent approach to communication and engagement with all private forest landowners.

With the reduced emphasis on active outreach campaigns to new landowners, the Private Forestry Education and Outreach Specialist will have capacity to think about our private forestry communications in this more holistic manner. The support this position provides to Tax Law communications will be on the informational side of Tax Law communications, not the technical or legal aspect. The SD document will be updated to include this new strategy, and the Position Description for this position will be updated to include this work emphasis.

Theme: Contribution of integrated field staff to support reconnaissance (recon) work for the Tax Law Forestry Program

A majority of the comments received on this topic expressed concern with the proposal. Primary themes included concern over increased workload, inclusion of the specialized tax law work into the integrated workload, and differences in classifications between Tax Law Forestry Specialists and Integrated field staff. Other commentors expressed support for the proposal, citing the alignment of this recon workload with the integrated workload, potential to improve culture, and the importance of assisting this core program. Some caveats included concern that this is still not enough support for the Tax Law section.

Response: Based on this feedback, we explored other options to accomplish the Tax Law Recon workload. Ultimately, we affirmed the proposal to have the integrated field staff assist with the tax law recon workload. The following are the main factors that contributed to this decision:

- We are committed to ensuring sound forestry occurs on all forested lands on which we have oversight, as this is a certification requirement.
- Ensuring sound and sustainable forestry is occurring is about good business and meeting our purpose. It is good forest management to take a look at our process after a sale is completed.
- Reconnaissance is not specialized work and is already part of the integrated staff skill set.
- We see potential for greater cross-boundary assistance to ensure that the shared goals of the Tax Law program do not become siloed from our integrated field work.
- The division has control over the timing, frequency, and amount of this work that we take on and can adjust annually to align workload with the capacity. The Tax Law Section will work with FIT to determine annual capacity and incorporate the recon workload into work planning.
- We are committed to continuing to evaluate the Tax Law Section model. As we look towards the next Strategic Direction, we will explore the effectiveness of this model as well as any alternate models to accomplish this work and support our private forest landowners.

Theme: Conversion of four Tax Law Forestry Specialists (TLFS) to Tax Law Administration Specialists (TLAS) to increase capacity for the tax law administrative workload

A majority of commentors on this topic expressed concern with this proposal, largely agreeing that there is a workload need, but not agreeing with the method of accomplishing this workload, questioning the efficiency of this shift and voicing concern over the loss of Tax Law Forestry Specialists. Conversely, several of the commentors supported the proposal.

Response: We continue to acknowledge the need to address the capacity to accomplish the program’s administrative workload. At the same time, after considering all of the feedback, we acknowledge that giving the Tax Law Section flexibility to further develop this concept and identify the best way to increase administrative capacity will likely lead to a more efficient and effective shift. Therefore, this strategy in the SD will be reversed, and the Tax Law Section will be asked to assess options for increasing administrative capacity within the existing staff allocation. This may include whole position conversion, partial position conversion, and/or additional administrative workload assigned to existing Forestry Specialists. At this time, possible position conversions of TLFS to TLAS will be capped at the equivalent of four full-term employees to align with the Tax Law recommendation that identifies this as the capacity needed to address the program’s administrative workload.

[Comments on Field Operations and Organization](#)

Theme: Area Forestry Staff Specialists (AFSS)

Several commentors who touched on AFSS expressed concern on the workload of the AFSS, specifically related to the addition of the Property Management and GNA duties on select AFSS positions. Commentors additionally suggested that the model proposed does not create more consistency. Two commentors requested private forestry to be added back into the AFSS workload.

Response: SLT members met with our AFSS and Area Forestry Leaders to discuss and get more pointed feedback on what was proposed. We acknowledge that the workload will not be consistent across positions; however, with this model, there will be greater clarity on goals and transparency on work objectives (who is covering what) for individual positions. These positions will be better aligned to meet specific statewide division work needs as well as retain capacity for area-specific support. As we enter the next Strategic Direction period, we will make sure there is a line of communication to support the execution of leadership intent and provide an avenue for feedback so that we may adjust if needed.

The Work Planning and Reporting Team will develop standardized work objectives for the AFSS positions, similar to forester and technician positions, to provide consistency within the division. Oversight and approval will be provided by our Field Implementation Team (FIT).

The language within our SD will be clarified to highlight:

- The intent to create clearer expectations and align the positions to meet specific statewide division work need
- The process of setting of annual performance objectives to identify work priorities and balance workloads.

Theme: Property Management Model

Several commentors on the property management model expressed concern with the supervision level being moved to the District Forestry Leaders, others expressed support or indifference for the model. Additionally, several commentors expressed concern with the investment level in property management and the model of taking a couple of the property managers out of field teams and the associated workload implications.

Response: Based on the comments received, our discussions mainly focused on the supervision level of the property managers. We revisited several different options discussed during strategic planning that included centralized supervision, team leader supervision, and area leader supervision. We reached out again to each of these supervision levels to get additional feedback. Ultimately, we affirmed the proposal that property managers will be supervised by District Forestry Leaders. Primary considerations included supervisor to staff ratios, variability across properties, and elevation of the program and work to an appropriate level.

Theme: Field Workload Management

Several commentors asked how the field workload is managed, with competing priorities and limited resources.

Response: Local workload for foresters and technicians is adjusted and planned for based on our annual work planning process. Strategic Direction provides our ideal workload allocation, but our reality includes vacancies and unforeseen events. Annual work planning is the process by which we evaluate the work that can actually be accomplished in a given year. This is where we look at our priorities, identify any shifts in work, and determine where we might be short (and either won't be able to accomplish the work or need to work across boundaries) and where we might have extra time to shift toward other priority workload.