

# DNR Responses to Comments Received during the Public Input Comment Period for “Proposed changes to the 2015 Urban Forestry Grant Program Ranking Criteria”

**Comment Period: June 1-June 23, 2014**

Note: The comments below are excerpts from emails received during the comment period. All emails received are attached in their entirety.

## Section 1: Strategic Direction Outcome Alignment

**A: The project directly impacts urban forest canopy on private property.**

### Section 1A

#### Comment #1:

*“Directly impacting private lands gives the appearance of focusing tax-payer, grant funding to private entities/property holders. I am not entirely sure I want my tax dollars to be funneled towards private landowners.”*

#### Section 1A Response #1:

Neither individual homeowners nor other private for-profit landowners will be (or ever have been) eligible for grant funds. However, grant funds will be focused preferentially on projects that impact private property, recognizing the high proportion of urban forests in private ownership and the benefit of a comprehensive management approach that looks beyond ownership boundaries. The DNR Division of Forestry Strategic Direction refers to this integrated management approach as the “community canopy model.”

**B: The project results in an increased capacity to provide financial support, services or markets.**

### Section 1B Comment #1:

*“Financial capacity seems a very hard measure or goal for non-profits or municipalities (most of your applicants). Are we encouraging these entities to function more as a business? If so, in a municipal setting, UF nearly always loses. It is very hard to quantify and convince decision makers to pay for something so ethereal as UF.”*

### Section 1B Response #1:

The intent of 1B is to favor projects that expand financial capacity of the applicant &/or its partners beyond traditional, limited funding sources because ongoing urban forest management increasingly will depend on reliable, independently maintained financial resources. There is no expectation for a municipality or non-profit to act as a business.

## Section 2: Long-Term Effect on Canopy and its Benefits

**C: Community is a Green Tier Legacy Community and project aligns with their charter strategy(s).**

### Section 2C: Comment #1:

*“Green Tier Legacy – should we state that this ‘organization’ or certification should have a direct impact on grant funding? What happens when they change their goals or objectives and then they don’t align? A grant rating re-do? Is there a way to encourage these ideas (energy efficiency, etc.) without*

*directly listing a third party?"*

**Section 2C: Response #1:**

The Green Tier Legacy Community (GTLC) designation is part of the Wisconsin DNR's Green Tier program. There is no third party. GTLCs have a signed agreement between the local government and the DNR to commit to "superior environmental performance." This agreement, known as the Charter, commits the community to work towards sustainable practices on a continuous quality improvement platform. The DNR works to support their efforts. The DNR support can take a variety of forms, one of which can be preference in Department grant programs. DNR Urban Forestry provides technical assistance to GTLCs as well as this grant preference. When ranking a grant application from a GTLC using this new guidance, the Department would evaluate the proposed project for its alignment with DNR Urban Forestry objectives as well as the GTLCs selected sustainability practices and goals. The better the project aligns with DNR and GTLC objectives, the higher the project could rank. This will be clarified by adding new wording to Section 2C so that it would read: *Community is a Green Tier Legacy Community and project aligns with their charter strategy(s) and DNR Urban Forestry strategic direction outcomes.*

For more information on the Green Tier Legacy Community program, see:

<http://dnr.wi.gov/topic/greentier/participants/legacycommunities.html> and [www.greentier.org](http://www.greentier.org)

### Section 3: Urban Forestry Program Building

**Section 3 Comment #1:**

*"No real comments. Like this section."*

**Section 3 Response #1:**

No response needed.

### Section 4: Priority Emerald Ash Borer (EAB) Preparation & Response

**Section 4 Comments # 1 & 2:**

1.

*"So, emphasis will be placed on treatments for EAB but not for removals/replacements? Isn't that promoting treatments when that really isn't a long term sustainable/viable option???*  
*If anything, [add to it my original comment that] if the public sees that grants are in favor of treatments and I as a municipal manager decide against them, this will raise some red flags for folks. It will kind of work against what we are doing here in Middleton and imply that treatments are the way to go. If treatments are afforded preference then so should removal/replacement programs."*

2.

*"EAB treatment as a goal seems a bit arbitrary. I had a community with around 5% ash with a very low average dbh (I think around 6"). My recommendation was to remove and replant. There was absolutely no reason to use herbicides in that case and it appears they would be penalized. EAB plans are always a good idea and I like this portion of the statement."*

**Section 4 Responses #1 & 2:**

Emphasis is placed on EAB insecticide treatment and readiness or operations plans over EAB removals/replacements or other EAB mitigation efforts. In particular, insecticide treatment is prioritized over removals/replacements, specifically to preserve and retain tree canopy – a high-priority goal in the DNR Forestry Division's strategic direction. This does not automatically exclude other EAB mitigation efforts from funding, but because grant funds are limited projects more closely aligned with DNR goals must be prioritized over other worthy efforts, especially those that may be categorized as routine work.

## Section 5: Model Capacity

**Section 5 Comment #1:**

*"Like this one too."*

**Section 4 Comment #1:**

No response needed.

## Comments on Whole Document

**Whole Document Comments # 1 & 2:**

*"Looks fine to me... I'm a little surprised that it doesn't get into more specifics, but maybe that detail is in the actual application. And not in the guidance document. If it works for you, go for it!"*

*"Overall, not too bad. Just a couple of bigger questions as noted above. Please let me know if you have any questions of me. Thanks for your work on this issue. I think it is a great idea to re-vamp the criteria!"*

**Whole Document Responses:**

The change to an outcome-based ranking system requires the applicant to apply in a more narrative manner. Thusly, the ranking prompts are relatively minimal in wording and a "scoring system" has been replaced with a more holistic evaluation tool.

## Changes Made:

New wording to (former) Section 2C so that it would read: *Community is a Green Tier Legacy Community and project aligns with their charter strategy(s) and DNR Urban Forestry strategic direction outcomes.*

Rearranging the order of the sections to better align with the application questions:

Section 1: Strategic Direction Outcome Alignment

Section 2: Priority Emerald Ash Borer (EAB) Preparation & Response

Section 3: Long-Term Effect on Canopy and its Benefits

Section 4: Urban Forestry Program Building

Section 5: Model Capacity

## Contact:

### Olivia Shanahan

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[olivia.shanahan@wi.gov](mailto:olivia.shanahan@wi.gov)

**From:** [Wahl, Brian D - DNR](#)  
**To:** [Shanahan, Olivia T - DNR](#)  
**Subject:** FW: DNR Urban Forestry Grants project rating criteria - comment period now open  
**Date:** Tuesday, June 03, 2014 10:26:00 AM

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Olivia,

More from Mark to add to his comment:

From Mark:

If anything, add to it (**my original comment**) that if the public sees that grants are in favor of treatments and I as a municipal manager decide against them, this will raise some red flags for folks. It will kind of work against what we are doing here in Middleton and imply that treatments are the way to go.

If treatments are afforded preference then so should removal/replacement programs.

Thanks!

Mark W.

Thank you Ms. O.

## Brian Wahl

Urban Forestry Coordinator  
South Central Region

Wisconsin Department of Natural Resources

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to evaluate how I did.

**From:** mdwegner@uwalumni.com [mailto:mdwegner@uwalumni.com] **On Behalf Of** Mark Wegner

**Sent:** Tuesday, June 03, 2014 10:22 AM

**To:** Wahl, Brian D - DNR

**Subject:** Re: DNR Urban Forestry Grants project rating criteria - comment period now open

Oh no problem Brian. It was more of conversational comment anyways to see what if anything you knew regarding that little bit.

If anything, add to it that if the public sees that grants are in favor of treatments and I as a municipal manager decide against them, this will raise some red flags for folks. It will kind of work against what we are doing here in Middleton and imply that treatments are the way to go.

If treatments are afforded preference then so should removal/replacement programs.

Thanks!

Mark W.

**From:** [Bluestem Forestry Consulting, Inc](#)  
**To:** [Shanahan, Olivia T - DNR](#)  
**Subject:** Grant rating comments  
**Date:** Monday, June 23, 2014 7:16:51 AM

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Hi Olivia,

Just a few comments regarding the grant ratings. I will address them by Section.

Section 1:

~Financial capacity seems a very hard measure or goal for non-profits or municipalities (most of your applicants). Are we encouraging these entities to function more as a business? If so, in a municipal setting, UF nearly always loses. It is very hard to quantify and convince decision makers to pay for something so ethereal as UF.

~Directly impacting private lands gives the appearance of focusing tax-payer, grant funding to private entities/property holders. I am not entirely sure I want my tax dollars to be funneled towards private landowners.

Section 2:

~Green Tier Legacy – should we state that this ‘organization’ or certification should have a direct impact on grant funding? What happens when they change their goals or objectives and then they don’t align? A grant rating re-do? Is there a way to encourage these ideas (energy efficiency, etc) without directly listing a third party?

Section 3:

~No real comments. Like this section.

Section 4:

~EAB treatment as a goal seems a bit arbitrary. I had a community with around 5% ash with a very low average dbh (I think around 6”). My recommendation was to remove and replant. There was absolutely no reason to use herbicides in that case and it appears they would be penalized. EAB plans are always a good idea and I like this portion of the statement.

Section 5:

~Like this one too.

Overall, not too bad. Just a couple of bigger questions as noted above. Please let me know if you have any questions of me. Thanks for your work on this issue. I think it is a great idea to re-vamp the criteria!

Kelli

Kelli Tuttle, President  
Bluestem Forestry Consulting, Inc.  
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Drummond, WI 54832  
715-739-6831

**From:** [j.treu](#)  
**To:** [Wyatt, Laura A - DNR](#); [Shanahan, Olivia T - DNR](#)  
**Subject:** RE: Comment on DNR UF Grant Rating  
**Date:** Wednesday, June 04, 2014 1:16:58 PM

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Looks fine to me... I'm a little surprised that it doesn't get into more specifics, but maybe that detail is in the actual applicaton. And not in the guidance document. If it works for you, go for it! Jeff

Sent from my Verizon Wireless Tablet

"Wyatt, Laura A - DNR" <Laura.Wyatt@wisconsin.gov> wrote:  
Dear Urban Forestry Council members and friends –

The **rating criteria for determining DNR Urban Forestry Grant awards** have undergone substantial revision in an effort to further align with the [DNR Division of Forestry Strategic Direction](#) and prioritize projects with the most impact. Projects will be evaluated on the applicant-defined outcomes and ranked by their alignment with specific state and national urban forestry management capacity goals and urban forest resource goals. Regardless of activity type, exemplary projects would be those that maintain or increase canopy, are inventory-driven, or move communities from “developing” to “managing” status. The proposed document is in draft form and posted on the DNR “proposed program guidance” webpage: <http://dnr.wi.gov/news/input/Guidance.html> . (Scroll down to Urban Forestry under Proposed Program Guidance.) If you wish to provide comment, you may do so until **June 23** by following the links & instructions on the Web page.

The proposed criteria will be in effect for the 2015 Urban Forestry Grant program year.

Thank you for your consideration.  
Laura

 *Laura Wyatt*

**Urban Forestry Council Liaison & Partnership Specialist**

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