

Wisconsin Woodland Owners Association, Inc.

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Special Committee on Review of the Managed Forest Land (MFL) Program members,

As a member of the Special Committee on Review of the Manage Forest Land (MFL) Program, I represent the Wisconsin Woodland Owners Association (WVOA), the only statewide education and service organization of private nonindustrial forest landowners. As an organization, we attempt to speak for the interests of such landowners in regard to policies and programs like MFL.

The WVOA Board of Directors has always supported MFL as a tool for encouraging sustainable management of Wisconsin forests. We have, however, found fault with some of the changes added to the law and the way it is administered. These concerns are based on questions and comments from our members, not on surveys or polls.

The ban on recreational leasing is a case in point. It deprives landowners of the a source of income, does nothing to increase the acreage open to the public, and discriminates against woodland owners as opposed to owners of agricultural land who can lease their land in spite of being enrolled in government programs like CRP.

WVOA has also favored changes in the way catastrophic loss is handled in connection with yield taxes on mandatory harvests. The taxes can, in some cases, surpass the actual proceeds of the sale.

Although WVOA has not gone on record, our board has expressed concern about a number of other issues in relation to MFL:

1. Is MFL a contract, an agreement, or neither, and can it be changed unilaterally by the state but not the landowner?
2. Must mandatory practices be applied arbitrarily and on schedule, with no flexibility or allowances for market conditions, etc.?
3. Should we have a system for rewarding landowners for producing biomass, sequestering carbon, or other ecosystem services, etc.?
4. Water quality and invasive species BMPs (Best Management Practices) are likely to become mandatory on MFL lands: how can the associated costs be handled?
5. Must all silvicultural practices be arbitrarily imposed in the face of landowner objectives and opinions to the contrary?
6. Should new management plans be required at the time of re-enrollment, and at landowner expense?
7. Are per acre charges appropriate when some landowners are in a position to benefit from Use Value Assessment, Agricultural Forest classification, etc., that might save them money without any requirement for sustainable management?
8. Are DNR foresters adequately trained in dealing with potential disagreements with landowners and resolving such situations?

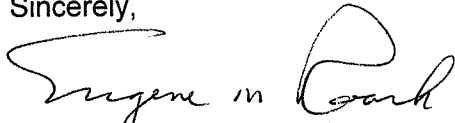
9. Is the appeals process used for resolving difficult cases of disagreement "stacked" or otherwise not equitable?
10. Is there adequate communication between DNR and MFL enrollees?

Not all of these issues lend themselves to legislative resolution. Some could be addressed through administrative rules or changes in DNR procedures.

Thousands of MFL "arrangements" will begin coming up for re-enrollment in 2011. WWOA is concerned that woodland owners who have had what they consider to be bad experiences with MFL will decided not to re-enroll. Some may seek out alternative ways to reduce real estate taxes while avoiding "being told what to do and when", and getting any technical assistance they want through normal channels. Others may simply let nature take its course.

What impact such a scenario would have on sustainable forestry in Wisconsin is hard to tell. It would seem to us, however, that anything we can do to make MFL more palatable, while maintaining its effectiveness, would be worthwhile.

Sincerely,



Eugene Roark