

Summary of comments received during the public review of the guidance: Oak Harvesting Guidelines to Reduce the Risk of Introduction and Spread of Oak Wilt

Thank you to all of the individuals and groups that provided feedback on the Department of Natural Resources proposed new guidance titled, “Oak Harvesting Guidelines to Reduce the Risk of Introduction and Spread of Oak Wilt”. The guidance was developed to provide recommendations to forest resource managers, loggers, equipment operators, contractors, and landowners on the relationship between the risk of introduction of oak wilt and the timing of any harvesting activities. The guidance aims to provide a useful tool that facilitates operational analysis and informed decision-making regarding the harvest of oak from forestland.

We received comments from 9 individuals/groups. Included in this document are the summary of the comments and responses to the comments. Please note that the following “Modifications” were removed from the final document based on the unanimous decision made by the Oak Harvesting Guideline Advisory Committee after the public comment period. The reasons for the removal were that these modifications were outside the scope of the guidance and that the statements will be confusing to users.

- (Chapter 2: Modification) Implement oak wilt seasonal harvesting restrictions due to a landowner’s limited risk tolerance or concerns about potential oak wilt impacts
- (Chapter 3: Modification 4) Expanding the oak wilt seasonal harvesting restrictions due to a landowner’s limited risk tolerance or concerns about potential oak wilt impacts
- (Chapter 4: Modification 5) Expanding the oak wilt seasonal harvesting restrictions due to landowner’s limited risk tolerance or concerns about potential oak wilt impacts

The guidance was approved by the Division of Forestry Administrator, Paul DeLong on September 24, 2015.

If you have any questions, please contact Kyoko Scanlon at (608) 275-3275 or [Kyoko.Scanlon@Wisconsin.gov](mailto:Kyoko.Scanlon@Wisconsin.gov).

Oak Harvest Guideline Review Public Comments and Responses

Comment No.	Comment	Change Made?	Response
1	<p>This comment has to do with modifying a harvest and may not fit into the guidelines. Nonetheless it is some guidance I've been looking for. Every now and then there are stands of pin oak that are going to be harvested and steered a different direction. That direction is often spray, trench, and plant pine. In those cases, maintaining oak at the stand level is not desired. In fact, it is one of the main reasons we spray. There are times where we want to see oak wilt spread throughout a stand in order to reinforce our spray efforts and to give the pine the advantage. However, that objective isn't always the same in an adjacent stand of pin oak where there may be other ownership or a healthier/younger stand of pin oak that we want to carry to rotation. Another aspect to this is that we have timber sales that are highly sought after for harvesting whenever the ground isn't frozen. That said, how much buffer do we need to cut along the boundary prior to oak wilt season and then continue the harvest in the remainder of the stand during oak wilt season in order to be confident that oak wilt won't spread to the adjacent stand before we spray the entire harvested area. I'll use a specific example to help illustrate my question. Prior to April 15, a logger clearcuts a 300 foot buffer along the boundary of a timber sale. He is cutting a fully stocked pin oak stand that doesn't appear to have oak wilt but is in an area where oak wilt is prevalent. The adjacent stand is also pin oak but is not being harvested and doesn't appear to have oak wilt. The entire harvested area will be sprayed to kill the oak stump sprouts within 16 months of the completed harvest. The big question: Is a 300 foot buffer overkill, too small, or just right? I understand this type of scenario may not be relevant to many that look at the guidelines but it is something we've tried without much backup or science.</p>	No	<ul style="list-style-type: none"> <li>• A clearcut buffer method is a costly measure that is not scientifically proven to be effective at this point.</li> </ul>
2	<p>This feels like this section should be simplified and converted into a side bar where modifications and exemptions are discussed for the first time. further back in the document</p>	Yes	<ul style="list-style-type: none"> <li>• The section "Differences between Exceptions and Modifications- documentation requirements" is best</li> </ul>

			<p>placed in Chapter 1 than Chapter 2 because some readers may go directly to Chapter 3 or 4 after reading Chapter 1.</p> <ul style="list-style-type: none"> <li>• “Exceptions” and “Modifications” were included in the glossary.</li> </ul>
3	<p>I have read the Oak Wilt Harvesting Guidelines and I compliment the Department on a very thorough document that appears to allow some oak harvesting while protecting the oak resource. However, throughout the document the emphasis is on how to avoid too much risk while harvesting oak in the wrong season.</p> <p>Oak forests are critically important wildlife habitat in Wisconsin. Oak forests are being converted to other forest types and they face threats from disease and insect pests. All wildlife habitat recommendations including private and public lands call for the long term maintenance of Wisconsin’s oak forests. The document emphasizes how landowners can harvest in oak forests and reduce the risk of oak wilt. The document should, in addition, emphasize how really important oak forests are for wildlife habitat, aesthetics, hunting opportunity, and biodiversity.</p> <p>It is important that the guidelines do not encourage the conversion of oak forests to other forest types. In addition, large reserve oak trees are a very important component of wildlife habitat and the guidelines should encourage landowners to maintain these trees and not risk losing them to oak wilt.</p> <p><b>Recommendations: Add to Chapter 1:</b></p> <ul style="list-style-type: none"> <li>• Add a short paragraph that emphasizes the <u>critical importance of oak forests and large oak reserve trees</u> to Wisconsin’s biodiversity, wildlife habitat, hunting culture, and aesthetics.</li> <li>• Add a short paragraph that emphasizes landowners <u>should not risk their oak forests</u> and should seriously consider the seasonal harvest restriction</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• A sentence “Oak is a very important component of Wisconsin’s forests ecologically and economically.” was added at the beginning of Chapter 1.</li> <li>• A foot note “For more information about oak resources in Wisconsin’s Forest, please refer to Appendix A” was added.</li> <li>• Appendix A: Stand-level oak wilt risk assessment should be used to further assess oak wilt risks, thus additional paragraph about risks is unnecessary.</li> </ul>

	because the modifications and exceptions do add a level of risk.		
4	These should be considered together. It is important to specify the time period as well. If the stand is 75% 70 year old oak and the long term is conversion to NH, are you really going to sacrifice the current crop of oak?"	No	<ul style="list-style-type: none"> <li>• “Non-oak type” and “oak is not an important component” are two different situations.</li> <li>• The Guidelines are not intended to include all scenarios.</li> </ul>
5	<ul style="list-style-type: none"> <li>• Very squishy. If you mean less than 20 sq. feet than support with evidence and simply statement. If not supported, then at least move 3A to modifications.</li> <li>• “What is "slightly" in this situation? Make this a firm number and allow for flexibility based on the guidance, don't try to include in the definition. It will make the problem about interpretation, not soundness of decision</li> <li>• Limiting distance for a 24" dbh tree is approx. 66'. This example may not necessarily be accurate. In this situation is the goal oak management? If not, doesn't it fit in the exemptions?"</li> </ul>	No	<ul style="list-style-type: none"> <li>• The word “slightly” is intended to provide flexibility. The word is used only for “Modifications”, which will require documentation and consultation with a DNR Forest Health Specialist or forester to assess the applicability of the Modification.</li> <li>• A clause “or refer to the root graft table (Appendix B)” was added to be more specific than ~100 feet.</li> </ul>
6	I see the Good Neighbor Policy is in each chapter however it didn't impact me to think about others. Wondering if there is a better way to write that statement so it actually causes folks to think for a second. When I read it I glared over it as it seemed like a disclaimer rather than informational.	Yes	<ul style="list-style-type: none"> <li>• The sentence is in a gray box to show that the information in the box is important. For the final layout, we will explore ways to make the sentence more eye-catching.</li> </ul>
7	I don't believe the guidelines specifically state that the only concern here is with red/pin oak. Since pin/red are the only species that produce spores, it might be worth a mention (for the resource managers) that <u>white/bur oaks are not a risk for overland spread and therefore can be moved without concern.</u> I know some properties have been using a cutting regulation that limits the delivery of oak to a wood processing facility during oak wilt season. I have modified my statement by limiting that regulation to pin/red oak only. I do allow bur/white oak to be hauled without restriction. This primarily affects loads being hauled to a residence for firewood.	Yes	<ul style="list-style-type: none"> <li>• A sentence that describes the difference in fungal mat formation among oak species was added under “Handling of infected wood” in Chapter 1.</li> <li>• The Guidelines do not address landscape-level management issues. Developing guidelines for handling infected wood is out of the scope of the Guidelines. To make it clear, we added a clause “There is no state regulation on the movement of infected wood, but ...” to the first sentence.</li> </ul>

8	The contributors did a nice job of weighing economics and ecology while creating the oak harvesting guidelines. However, I suggest that more emphasis is placed on handling infected wood in Chapter 4 (as opposed to stating see chapter 1). In my experience many foresters do not inherently know how to handle the diseased wood, and the threat of new infection centers stem from human transport of diseased wood that results in unintentional delivery of the fungus to a new area.	Yes	<ul style="list-style-type: none"> <li>• Currently there is a sentence “Follow recommendations on handling infected wood” in the gray box of Chapter 4. Adding more information in the gray box will clutter the box and the focus for important information will be compromised. For the final layout we will explore ways to make the sentence more eye-catching.</li> <li>• The sentence “For more information on the handling of oak wilt infected wood, refer to Appendix A” was added.</li> </ul>
9	Do you need to say 4 mil “clear” plastic and include “the wood pile needs to be completely covered with the plastic down to the ground and weighted down so nothing can get in or out of the plastic” or something along those lines?	Yes	<ul style="list-style-type: none"> <li>• Tarp does not need to be clear.</li> <li>• A clause “down to the ground and weighted down so beetles won’t enter the pile” was added.</li> </ul>
10	A significant number of MFL cutting notices will no longer be approved or reviewed by DNR foresters. This may present a challenge in monitoring how the implementation of these new guidelines is going.	No	<ul style="list-style-type: none"> <li>• Monitoring can be done by cutting notices because cutting notices are still submitted to DNR.</li> </ul>
11	This (map good through dates) does provide flexibility but could be refined. If a sale is under contract the lack of change is understood but if a CCF is planning a sale, could the new evidence simply be ignored? This should be explored more or it could be abused.	Yes	<ul style="list-style-type: none"> <li>• A sentence to clarify that the map needs to be considered at the time of timber sale establishment was added to the section “How to use the Guidelines” in Chapter 1.</li> <li>• The Guidelines state that a new map could be used if practical.</li> </ul>
12	<ul style="list-style-type: none"> <li>• Provide procedures to modify or exempt harvests and management practices</li> <li>• Definitions for both should be supplied. Exemptions are common but what are they?</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• Definition and procedures are described in Chapter 1. However, we will explore ways to make the sentence more eye-catching in the final layout.</li> </ul>
13	This (Modification: Unusual weather pattern) should be noted or documented to assure accountability. If the manager uses this and the Health Spec concurs or does not concur, it	No	<ul style="list-style-type: none"> <li>• Since it is a Modification, its reasoning will be documented.</li> </ul>

	should be recorded.		
14	I know this isn't a silviculture handbook, but I think it would be appropriate for the guidelines to mention that thinning pin oak when the stand is at or nearing maturity is ill-advised when oak wilt exists nearby. This, of course, assumes that the objective is to maintain healthy oak with, perhaps, the intention of capturing the remaining volume in a future harvest. Similar to the GTR argument, this practice exposes the trees to untimely wind damage. In the end, it would be more economical for the State and the loggers to do a regeneration harvest during the first entry.	Yes	<ul style="list-style-type: none"> <li>• It is a silvicultural suggestion, and is out of the scope of the Guidelines. The appropriate source for this suggestion should be the Silviculture Handbook. To make it clear, the sentences "The Guidelines are not prescriptions for managing oaks or regenerating oaks. The silvicultural prescription should come from other sources such as the Silviculture Handbook. These guidelines are meant to be used in conjunction with these sources." was added in Chapter 1.</li> </ul>
15	The guidelines do a good job of loosening up the restrictions when significant oak wilt is present in a stand. The guidelines could be a little more blunt though by questioning (in a professional way) why anyone would make the decision to manage a stand for pin oak (this is an 80 year commitment) when 20% or more of the stand is infected. Some additional guidance might help managers realize there is a more sustainable option based on what we know about a stand today.	Yes	<ul style="list-style-type: none"> <li>• It is a silvicultural suggestion, and is out of the scope of the Guidelines. The appropriate source for this suggestion should be the Silviculture Handbook. To make it clear, the sentences "The Guidelines are not prescriptions for managing oaks or regenerating oaks. The silvicultural prescription should come from other sources such as the Silviculture Handbook. These guidelines are meant to be used in conjunction with these sources." was added in Chapter 1.</li> </ul>
16	Consider <i>Q. macrocarpa</i> and <i>Q. bicolor</i> as well (in Exception 4 of Chapter 4 and 5).	No	<ul style="list-style-type: none"> <li>• <i>Q. macrocarpa</i> and <i>Q. bicolor</i> are not as resistant to oak wilt as <i>Q. alba</i>.</li> </ul>
17	I know the guidelines mention the benefits of oak GTR, even if the leave oaks die of oak wilt. Perhaps they could go a little further in describing the impacts that GTR, which becomes infected post-harvest, could have on adjacent stump sprouts. Here are a few assumptions. One, old pin oak that	Yes	<ul style="list-style-type: none"> <li>• It's a management decision. The Guidelines are not intended to explain all scenarios.</li> <li>• A clause to explain that reserve trees in the red oak group may allow</li> </ul>

	is left for GTR is exposed and vulnerable to wind damage, even if it's a year or two after the harvest. Two, the root systems remain intact throughout the regeneration phase, maintaining a connection between the GTR and the stump sprouts. And three, fresh wounds between April and July, near but not connected to existing oak wilt infections, are likely to get infected. I think the guidelines should state that if a stand of pin oak is being regenerated and pin oak is the only option for meeting GTR, then GTR should be discouraged when infections are known to occur within six miles.		oak wilt to spread through root grafts to nearby stump sprouts was added in Chapter 5.5.
18	Is this (salvage harvesting) getting at evaluation of risk or working with the result of a natural disaster? "Potential" and "as a result of" are not the same thing. Being exposed to high potential loss could occur with or without natural disaster and many use "salvage" to mean pre-salvage. This could be tightened up to avoid pre-salvage to avoid perceived economic risk. If that is intended it should be stated elsewhere		<ul style="list-style-type: none"> <li>• It's a modification and needs to be consulted with FH staff and also need to be documented, so the risk of the modification being used incorrectly should be low.</li> </ul>
19	In both chapters 3 and 4 there are modification considerations for salvage harvests. It may be necessary to further explain the difference of removing individual trees vs. harvesting large areas of a stand. It is easy for a landowner to economically justify salvaging one quality red oak to capture its value however may not recognize that in doing so may end up jeopardizing the residual stand and even greater value. Do I have a valid concern?	No	<ul style="list-style-type: none"> <li>• Salvage harvesting is a "Modification" and consulting a DNR Forest Health Specialist or forester is advised in the Guidelines to further assess the use of this Modification.</li> </ul>
20	(Regarding stump treatment) Isn't there also usually limb damage during these types of harvests? Is stump treatment during a harvest, not a street tree or urban situation, a proven prevention measure?	Yes	<ul style="list-style-type: none"> <li>• Further explanation of stump treatment, including effectiveness of various treatments, is provided in Chapter 5.9.</li> <li>• A scientific journal that proved the effectiveness of wound dressing to prevent oak wilt was added to references.</li> <li>• In Chapter 5.3, it is stated that when the existing basal area of oak is high, even if all oak stumps were</li> </ul>

			immediately treated with wound dressing, residual oak trees would likely be injured during harvesting activities, and these wounds would provide entry points for the oak wilt fungus.
21	Should we specify appropriate types of wound dressings? For example are the tar-based dressings considered effective or appropriate?	No	<ul style="list-style-type: none"> <li>• The use of wound dressing on fresh cut surface is proven effective to protect infection through the treated surface from oak wilt.</li> <li>• Specification of the types of wound dressing on stumps is unnecessary because phytotoxicity is not an issue on stumps.</li> </ul>
22	I don't know if this is appropriate as this document deals with harvesting of oaks, but I do receive periodic comments/concerns from DNR field foresters about the difference in harvesting time frame and what we tell folks about no prune timeframe (April 1 – August 1) and this can be confusing or they may not be aware of that timeframe. Then we add that utilities can prune in the rural areas anytime if they use paint during the no prune time frame, I'm just thinking you may want to acknowledge this somewhere in the document as an additional FYI item for these field foresters who receive inquiries from yard tree landowners.	Yes	<ul style="list-style-type: none"> <li>• The guidelines has a section "Oak cutting and pruning recommendations in urban areas" in Chapter 1 and there is information included for urban areas.</li> <li>• It is outside of the scope of the Guidelines to explain why there is discrepancy among the Guidelines, urban, and utility rules.</li> <li>• It is out of scope of the Guidelines to include detailed information regarding utility rules. However, a link to the PSC website that describes their oak wilt rules was included.</li> </ul>
23	Are they not also used by Cooperating Consulting Foresters? This should be amended to make sure that this is obvious.	No	<ul style="list-style-type: none"> <li>• It is out of scope to discuss the agreement by Cooperating Consulting Foresters. The Guidelines are required for specific landowners.</li> </ul>
24	(Regarding hybrids) Should this be "red" oak or? If not, it's kind of confusing, at least to me it is.	Yes	<ul style="list-style-type: none"> <li>• It is about hybrid in the white oak group. To reduce confusion, the sentence "Stands with mixtures from the white oak group may also</li> </ul>

			contain interspecific hybrids...” was moved to the end of the first paragraph of Chapter 5.4 so all the susceptibility information will be in the first paragraph.
25	<ul style="list-style-type: none"> <li>• “harvesting-restricted dates” is mouthful and we should come up with a different wording.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• “Harvesting unrestricted periods” was changed to “Non-restricted periods” for clarification.</li> </ul>
26	<ul style="list-style-type: none"> <li>• What are other vectors besides insects? This could be reworded to reflect that there are more vectors more than insects (if this is the case). If there are no other vectors or insects are the most important this should be noted too.</li> <li>• Do you really mean insects or beetles? If so that it is okay to simply say that. If there are other vectors they should be listed somewhere earlier in the document.</li> </ul>	Yes	<ul style="list-style-type: none"> <li>• The word “insects” was used instead of “vectors” where interchangeable to avoid confusion in Chapter 1-4.</li> <li>• The word “Vector” will be used in Chapter 5 because the chapter provides technical information.</li> </ul>
27	Change to “Avoid harvesting during the oak wilt restriction period (North 4/15 – 7/15; South 4/1 – 7/15)” instead of “Harvesting is recommended only during the harvesting unrestricted period due to oak wilt (North 4/15 – 7/15; South 4/1 – 7/15)”.	Yes	<ul style="list-style-type: none"> <li>• ”Harvesting unrestricted period” was changed to “non-restricted period” for clarity.</li> </ul>
28	Change to “Forest management activities in stands with an oak component should only be considered during the restricted period under conditions listed as exceptions or modifications below. If harvesting will occur during the restricted period consider the impact to adjacent stands” instead of “Harvesting or any activities that may wound oaks should only be considered during the harvesting-restricted period under certain conditions listed below as Exceptions or Modifications. If you choose to harvest during the harvesting-restricted period due to oak wilt, consider the impact to adjacent stands”.	Yes	<ul style="list-style-type: none"> <li>• Wording change was made.</li> </ul>
29	Change from “seed-based” to “seed-origin”	Yes	<ul style="list-style-type: none"> <li>• Changed to “seed-origin”.</li> </ul>
30	Word change suggestions on glossary	No	<ul style="list-style-type: none"> <li>• Definitions that were directly taken out of the Silviculture Handbook Appendix A Glossary of Terms were not changed to be consistent with the Silviculture Handbook.</li> </ul>



# Wisconsin Woodland Owners Association, Inc.

P.O. Box 285, Stevens Point, WI 54481-0285

[www.wisconsinwoodlands.org](http://www.wisconsinwoodlands.org)



July 20, 2015

**WVOA OFFICE**  
**EXECUTIVE DIRECTOR**  
Nancy C. Bozek  
P.O. Box 285  
Stevens Point, WI 54481  
715-346-4798  
[wwoa@uwsp.edu](mailto:wwoa@uwsp.edu)

**WVOA OFFICERS**  
**BOARD OF DIRECTORS**  
2014-2015

**PRESIDENT**  
Paul Kienitz  
500 S. Center Avenue  
Merrill, WI 54452  
715-536-6823  
[paul.kienitz@riversideathletic.com](mailto:paul.kienitz@riversideathletic.com)

**VICE PRESIDENT**  
Marilyn Steele  
P.O. Box 1758  
Valparaiso, IN 46384  
219-462-6421  
[msteelern@comcast.net](mailto:msteelern@comcast.net)

**SECRETARY**  
Mike Bohman  
N8109 Wolf River Dr.  
Algoma, WI 54201  
920-487-3197  
[michaelfbohman@hotmail.com](mailto:michaelfbohman@hotmail.com)

**TREASURER**  
Arlene Roehl  
159 Lakeview Ave.  
Long Lake, MN 55356  
952-473-3036  
[arcompliance@bigplanet.com](mailto:arcompliance@bigplanet.com)

**DIRECTORS**  
David Congos  
N51562 Harriman Rd.  
Osseo, WI 54758  
715-597-2272  
[dlcongoss49@gmail.com](mailto:dlcongoss49@gmail.com)

Jan L. Lehr  
N10811 Co. Hwy. P  
Iola, WI 54945  
715-677-3850  
[leelehrer@wi-net.com](mailto:leelehrer@wi-net.com)

Steven Raether  
4530 CTH K  
Chippewa Falls, WI 54729  
715-723-9736  
[raetherrees@gmail.com](mailto:raetherrees@gmail.com)

Steven J. Ring  
W7004 Detention Rd.  
Shiocton, WI 54170  
920-735-9702  
[sring@utilityssi.com](mailto:sring@utilityssi.com)

Charles R. Wagner  
E1934 Cty. Rd. S  
Luxemburg, WI 54217  
920-837-7712  
[wagnerc50@yahoo.com](mailto:wagnerc50@yahoo.com)

Richard Wagner  
E5861 Clark St.  
Weyauwega, WI 54983  
715-281-7032  
[richardwagner@centurytel.net](mailto:richardwagner@centurytel.net)

Randy Williams  
N1896 Cozy Lane  
Antigo, WI 54409  
715-623-5660  
[willir2456@gmail.com](mailto:willir2456@gmail.com)

Mark Guthmiller  
Plant Pest and Disease Specialist  
3911 Fish Hatchery Road  
Fitchburg, WI 53711  
[Mark.Guthmiller@Wisconsin.gov](mailto:Mark.Guthmiller@Wisconsin.gov)

Subject: Comments on draft document *Oak Harvesting Guidelines*

Dear Mark,

The Wisconsin Woodland Owners Association (WVOA) fully supports the *Oak Harvesting Guidelines* as proposed.

WVOA is a nonprofit, educational association working with Wisconsin's private woodland owners to encourage sustainable forest management on their lands. Of Wisconsin's 16.7 million forested acres more than 9 million acres are privately owned.

As written the *Oak Harvesting Guidelines* are a win/win for all parties: private woodland owners, industrial partners and the public. When sustainable forestry is upheld, the long-term economic, social and environmental benefits of Wisconsin are strengthened.

As an external stakeholder please accept our comments and appreciation for allowing us to participate as a representative on the Advisory Committee. We would like to especially thank the Science Sub-Committee for their input, expressing their concerns, and providing the Advisory Committee with the latest research.

Sincerely,

Paul Kienitz  
President

cc. Rebecca Gray  
Chair, OHG Advisory Committee