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November 15, 2005

Stan Dixon, Chairman
California Board of Forestry and Fire Protection
PO Box 944246
Sacramento, CA 94244-2460

Sacramento, CA

Subject: Request to have 14 CCR 939.15 (northern) and 14 CCR 959.15 (southern) modified to facilitate restoration of aspen (*Populus tremuloides*)

Dear Mr. Dixon:

The Northern California Society of American Foresters (NorCal SAF) requests the California State Board of Forestry and Fire Protection modify 14 CCR 939.15 (northern) and 959.15 (southern) to facilitate the restoration of aspen (*Populus tremuloides*).

We are asking for this change because aspen regeneration and growth requires direct sunlight. It is a shade intolerant species and has been in decline in California's mixed conifer and eastside pine forest types because of conifer encroachment and competition. Thinning conifers out and away from aspen will help restore this important and limited forest component.

The current language at CCR 939.15 Protection of Wildlife Habitat [Northern];

All trees within meadows and wet areas may be clearcut and these are exempted from stocking provisions in order to attain or retain these areas for wildlife and livestock. These areas shall be shown on the plan map.

and CCR 959.15 Protection of Wildlife Habitat [Southern];

(a) Where present at the time of timber harvest, 400 sq. ft. basal area of oak per 40 acres should be retained and protected, giving preference to deciduous oaks. Oaks should be retained on areas designated by DFG as deer migration corridors, holding areas, or key ranges when consistent with good forestry practices.

(b) All trees within meadows and wet areas may be clearcut and these are exempted from stocking provisions in order to attain or retain these areas for wildlife and livestock. These areas shall be shown on the plan."

We propose that CCR 939.15 should be rewritten as;

All trees within aspen stands, meadows and wet areas may be clearcut and these areas exempted from stocking provisions in order to attain or retain these areas for wildlife and livestock, and to

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balance the protection and regeneration of aspen and meadow habitats in California's forest ecosystems with the other goals of forest management as specified in 14 CCR 897. These areas shall be shown on the plan map.

and CCR 959.15.

(a) Where present at the time of timber harvest, 400 sq. ft. basal area of oak per 40 acres should be retained and protected, giving preference to deciduous oaks. Oaks should be retained on areas designated by DFG as deer migration corridors, holding areas, or key ranges when consistent with good forestry practices.

(b) All trees within aspen stands, meadows and wet areas may be clearcut and these areas exempted from stocking provisions in order to attain or retain these areas for wildlife and livestock, and to balance the protection and regeneration of aspen and meadow habitats in California's forest ecosystems with the other goals of forest management as specified in 14 CCR 897. These areas shall be shown on the plan map.

The documents cited in the enclosure, references, demonstrate the ecological needs of aspen and the effectiveness of removing competing conifers.

Please contact me or John Kessler, NorCal SAF Policy Chair, if you have questions regarding this request. Thank you for your time and consideration.

Yours truly,

Julie Lydick, Chair
Northern California Society of American Foresters

Cc:
John Kessler, Chair
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Enclosure: Reference

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References

Shepperd, Wayne D. 2004. Techniques to restore Aspen Forests in the Western U.S. Transactions of the Western Section of the Wildlife Society 40: 52- 60.

DeByle, Norbert V.; Winokur, Robert P. eds. 1985. Aspen: Ecology and management in the western United States, USDA Forest Service Rocky Mountain Research Station. Fort Collins, CO. General Technical Report RM 119.

Shepperd, Wayne D.; Binkley, Dan; Bartos, Dale L.; Stoyhlgren, Thomas J.; and Eskew, Lane G., compilers. 2001. Sustaining Aspen in Western Landscapes: Symposium Proceedings; 13-15 June 2000; Grand Junction, CO. Proceedings RMRS-P-18. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 460 p.

Jones, Bobette E., Rickman, T.H., Vazquez, A., Sada, Yukako, and Tate, K.W. 2005. Removal of encroaching conifers to regenerate degraded aspen stands in the Sierra Nevada. Restoration Ecology, vol. 13, no. 2, pp. 373-379.