



June 25, 2013

TO: Ara Andrea, Regulatory Program Manager, Idaho Department of Lands
RE: Comment on Proposed Class 1 SPZ rules

Dear Ara,

I would like to provide comment on the proposed Shade Rule along Class 1 streams. I absolutely agree with the need to replace the existing "75% Shade rule" with a rule that is quantifiable, enforceable, and supported with credible science. I believe the Forest Practice Advisory Committee (FPAAC) and Idaho Department of Lands have crafted a rule that achieves that objective.

The proposed Shade Rule has two options for management within the Stream Protection Zone (SPZ) of Class 1 streams, both of which offer reasonable shade protection while still allowing some management within the SPZ. This flexibility is imperative for private landowners who wish to manage for healthy timber, wildlife, and fisheries in the various forest types.

As an industrial timberland owner/manager and a small tree farm owner, I support the proposed rule as a workable solution to "fixing" the current shade rule. I implore the FPAAC and IDL to continue with adaptive management strategies that seek to formulate or revise rules using the most current and credible science available. Monitoring and quadrennial audits can be effective tools to justify rule revisions – particularly those less restrictive to private landowners.

Thank you for all of the hard work you and your team have put into this process.

Best regards,

Paul Buckland, CF
Forest Resource Manager