



**STIMSON LUMBER COMPANY**

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Mr. Tom Schultz  
Director  
Idaho Department of Lands  
PO Box 83720  
Boise, ID 83702

June 14, 2013

Dear Director Schultz:

Stimson is a privately held forest products company that operates mills and owns lands in Oregon, Washington, Montana, and Idaho. Having workable and meaningful Forest Practice Act (FPA) rules are crucial to the forest products industry.

Stimson has been involved in the proposed changes to the FPA shade rule language and we support the changes proposed by the Idaho Department of Land as described below:

- Addition of two new rule subparagraphs (20.02.01.030.07.e.ii. and 20.02.01.030.07.e.iii.), defining the new minimum standing tree requirements for both sides of all Class I and Class II streams in Idaho forestlands.
- Removal of the substance of four existing rule subparagraphs (20.02.01.030.07.e.ii., 20.02.01.030.07.e.vi., 20.02.01.030.07.e.vii., and 20.02.01.030.07.e.ix.), eliminating the current streamside-protection rule sections defining required tree retention in riparian, streamside areas.

I thank you for the opportunity to comment on the proposed changes .

Sincerely,

David Brummer  
Regional Procurement and Marketing Manager  
Stimson Lumber Company