

Craig Foss, Forestry Assistance Bureau Chief
Archie Gray, Forest Practices Act Program Manager
Idaho Department of Lands
3284 W. Industrial Loop
Coeur d'Alene, ID 83815-6021

RE: Comment on Proposed Rulemaking for Streamside Tree-Retention (Shade Rule)

September 22, 2013

Dear Sirs,

I would like to comment on the new streamside shade rules that are being proposed.

I am a small logging contractor, since 1997, and part owner of a 600+ acre tree farm and cattle ranch. We have several Class One streams on our property.

The proposal to limit the first 25 feet of the SPZ to a RS of 60 is a poor idea in my opinion. First of all, most of our place won't even make that, so it would be virtually a no cut zone. How can we manage our timber and keep it health if we can't harvest at least the old and dying trees? Also, I was involved with setting up a RS survey on a stream segment with the help of two IDL PFS guys. This was very time consuming and cumbersome. Is there not a more practical way to measure the shade?

Additionally, the stream size and aspect should also be taken into consideration, most of our streams around Moscow Mountain can be stepped over. Does this really require the same shade as a 10 foot or 15 foot wide stream?

Thank you for allowing me to comment on this proposed rule. I appreciate the work that the IDL and IFPAAC have done. It's just too bad we can't tell the federal government that when they start managing their own land, then they might have the right to tell us how to manage ours!

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Packard", with a long horizontal line extending to the right.

Larry Packard
Packard Logging Inc.

RECEIVED
SEP 25 2013
IDAHO DEPT. OF LANDS
COEUR D'ALENE IDAHO