



Potlatch Forest Holdings, Inc.

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Archie Gray
Forest Practices Program Manager
Idaho Department of Lands
Coeur d Alene, ID

Dear Archie,

With this letter Potlatch Forest Holdings is offering its support for the proposed rules on tree retention next to Class I streams and other rule changes.

As we stated in our June 24, 2013 letter on these same rules, Potlatch understands the exhaustive effort put forward by IDL to develop the technical basis for Class I tree retention rule as well as the efforts to share information with the full range of stakeholders. These efforts are unsurpassed in our long experience and participation in Idaho forest practices.

Based on the quality of this effort we fully support these proposed changes.

We are also aware of input of other affected stakeholders and some of their concerns regarding the proposed rule. Our view is that further analysis cannot and will not resolve the various concerns of this rule being overly- or under-restrictive. The Idaho FPA has a long and successful history as an adaptive management program and we see no value in entering analysis-paralysis with this rule. At this point we believe it is time to pass, implement and monitor the new rule. We are confident that within two years of implementation IDL, DEQ and other interested parties can have sufficient field data to present to the Forest Practices Committee to critically evaluate performance of this rule.

In summary, we support the full package of proposed rule changes.

Thank you for the opportunity to comment.

Sincerely,

Darin Ball
Idaho Unit Manager