

August 18, 2016

Archie Gray, CF
Sale Administration and Scaling Program Manager
Idaho Department of Lands
3284 W. Industrial Loop
Coeur d' Alene, ID 838115

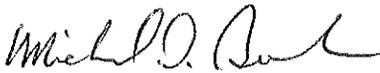
Dear Mr. Gray,

Tripco Forest Products wishes to comment on the Department of Lands proposed rulemaking. In reviewing the current proposal regarding the elimination of the "Requirements for Cedar Poles" sales program and the change to a "High-Value Forest Products Sales" we find the proposal falls short of providing the highest value to the endowment as mandated in the constitution. It also further stifles the specialty product manufacturers ability to compete for the high value component of the timber sales.

We feel that the only way to actually achieve the highest value to the endowment will require the Department to more actively merchandise these high value species. As we have suggested previously this is the method used by virtually all private timber companies large and small to maximize the value of their resource. In fact when a purchaser such as us or any other specialty manufacturer buys a timber sale we are forced to merchandize that portion of the sale that would go into the general commodity market. It is our position that the Department can accomplish this merchandizing strategy and thus realize the added value to the endowment.

We therefore recommend that this negotiated rulemaking be delayed until a more equitable merchandizing program can be developed to account for high valued species. We look forward to working with the Department and all other stake holders to accomplish a sound "High-Value Forest Products Sales" program.

Sincerely,



Michael D. Boeck

Resource Manager

Tripco Forest Products

