



RILEY STEGNER AND ASSOCIATES

July 22, 2026

Director Dustin Miller
Idaho Department of Lands
300 N. 6th Street, Suite 103
Boise, ID 83702

Delivered via electronic mail.

Re: Docket No. 20-0201-2601—Timely Salvage of Dead, Dying, or Threatened Timber

Dear Director Miller:

On behalf of Idaho's forest products industry, we write in support of the proposed rule establishing requirements for the timely salvage of dead, dying, or threatened timber when feasible on qualifying non-private forestlands.

As industry representatives indicated during the July 8, 2026, negotiated rulemaking meeting in Coeur d'Alene, the industry also supports placing these provisions in a separate, standalone section of the Forest Practices Act rules. A distinct section would improve clarity and appropriately recognize timely salvage as an important forest-health and resource-management requirement.

If the intent is to connect the feasibility standard to the salvage decision considerations, then we recommend one additional clarification. The rule should expressly state that the three factors listed under "Salvage decisions shall consider"—the economic value of the timber to be salvaged, the immediate costs of salvage efforts, and the long-term costs to forest resources and values—are considerations used in determining whether salvage is "feasible." This clarification would help ensure consistent implementation of the rule.

Thank you for considering these comments and for the Department's work through the negotiated rulemaking process.

Sincerely,

Peter Stegner
Principal
Riley Stegner and Associates