

Issue with the current Shade Rule and requests – Farm Bureau Forestry Committee

My name is Bob Smathers (Farm Bureau staff) and I am here on behalf of the Idaho Farm Bureau Forestry Committee to comment on the Shade Rule. Simplification of the rule does make it better and that is appreciated. However, there are some issues the IFBF forestry committee wants expressed and some requests the committee would like to make.

Issues:

1. It is the sentiment of the committee that the shade rule is a “one size fits all rule” that is being applied from north to south in the region and over all habitat types with no deviation. There is ample complexity in forest environments, yet the shade rule focuses on one thing only; shade from trees. What about shade from topography, shade from riparian vegetation and shade from banks. An Oregon State University Study by George Brown and James Krygier (1970) found that riparian vegetation has a dramatic influence on stream temperatures in clear cut situations. They found that stream temperatures declined dramatically within a clear cut starting in year two after all vegetation had been burned. Within 6 years, after clearcutting, stream temperatures were back to historical lows. This would have been mostly due to riparian vegetation and small trees (abstract attached). What about temperature impacts from groundwater, springs, and substrate types. There is a dramatic difference in impact on stream temperature resulting from substrate such as bedrock vs alluvial gravel. The one thing the shade rule focuses on (shade from trees) is the one thing that impacts landowner profitability the most. There needs to be more flexibility in the rule to account for other significant factors affecting stream temperature.
2. Topography is not factored into the shade protection rule. It is the sentiment of the committee that common sense should be used in situations where shade is a feature because of topography. If there’s 100 percent shade due to topography, then why leave so many trees.
3. Industrial landowners have an advantage that NIPF landowners do not have when it comes to the shade rule. Leaving trees adjacent to Class I streams is not as burdensome for the industrials because they have substantial amounts of class II stream acreages in the upper reaches of stream drainages where they can cut every tree right down to the stream. NIPF landowners have very little Class II stream acreage in the lower elevations to compensate for this. Yet they pay property taxes on this land that they cannot manage.

Requests:

1. Shade from all sources must be recognized in the shade rule, not just shade from trees. Riparian vegetation does shade streams and it provides shelter and food for fish. In fact, riparian vegetation improves fish habitat by providing cover for salmonids to avoid predation. Brush and grasses do not grow where tree canopies filter out the sunlight.
2. Only 8 percent of all Idaho forestland is in NIPF ownership. IDL must demonstrate through data a negative impact on stream temperatures from harvest of NIPF before requiring continued compliance with the shade rule by NIPF landowners.
3. IDL should authorize projects on NIPF lands which would allow for data gathering to demonstrate the stream temperature impact of increased harvest in SPZ within different forest types and regions.
4. IDL should authorize projects on NIPF lands which would allow for data gathering to demonstrate the length of time for naturally regenerated shade from both riparian and tree sources in the SPZ across different forest types and different systems/levels of harvest.

From: [Bob Smathers](#)
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