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May 7, 2021

Mr. Gary Hess
Regulatory and Stewardship Program Manager
Forestry and Fire Division
Idaho Department of Lands
3284 W Industrial Loop
Coeur d'Alene, Idaho, 83815

RE: IDAPA 20.02.01 - Negotiated Rulemaking

Dear Mr. Hess:

Idaho Forest Group (IFG) appreciates the opportunity to provide public comment regarding the Idaho Department of Land's intention to promulgate forest practice rules during the negotiated rulemaking period. Proposed rule revisions are based on language proposed by the Idaho Forest Practices Advisory Committee (FPAC) and recommended revisions to IDAPA 20.02.01. These revisions are intended to update and simplify the rule and promote understanding and compliance while also maintaining or enhancing water-quality.

IFG believes that the simplified language in the revised rules provide a more concise and clear explanation of IDAPA 20.02.01 rules and regulations. These revisions should allow for more practicable implementation of Forest Practice Act rules as well as Best Management Practices on forest lands in Idaho.

Addition of Traction-Assisted Harvesting to the IDAPA ruleset is opportune as this "new" method of harvesting provides enhanced operational capacity for ground-based harvesting operations while maintaining low soil disturbance and increasing safety.

The proposed Class I Stream Protection Rule revision to IDAPA 20.02.01.30.07e. ii - viii. Stream Protection, resulting in simplified field application is to be commended. The existing verbiage and process often leads to confusion on the rule requirements and is difficult and often expensive to implement. The proposed rule language is easier to understand, more efficient to implement on the ground, and provides for greater management flexibility while maintaining appropriate protections.

IFG supports road specifications that result in actual reductions of sediment delivery including the added measures for rocking of Class I stream crossings and armoring the inlet of new stream crossing culverts greater than 30" diameter. We do note; however, that these measures are an additional management cost that will be a greater burden on small private forest owners.

Idaho Forest Group appreciates the continued efforts of the Idaho Department of Lands and FPAC for providing professional and practical rules that protect and enhance the natural resources and forests of



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Idaho. We support the proposed rule changes.

Thank you for the opportunity to provide comment and participate in the negotiated rulemaking.

Sincerely,

A handwritten signature in blue ink that reads "Tera R. King".

Tera King,
Resource and Business Analyst