



September 20, 2021

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: Docket 20-0201-2101 – IDAHO FOREST PRACTICES ACT

Dear Mr. Hess:

PotlatchDeltic writes in full support of the Proposed Rules in docket 20-0201-2101 pertaining to the Idaho Forest Practices Act (FPA). The proposed rule set simplifies Forest Practice Act (FPA) implementation, increases resource protections, and increases management flexibility.

Stream Protection Rules

The proposed simplified "Shade Rule" (030.07.e.ii (2014)) is well designed to provide stream shade next to Class I Streams, maintain water temperature and provide a source of future large organic debris (LOD). Over the last 14 months we have been operating under a waiver issued by IDL for the Stream Protection Rule (IDAPA 20.02.03 030.07.e.ii). The intent of the waiver is to allow testing of the modified stream protection methodology using weighted tree counts (WTC) in place of relative stocking. The modified rule language in our waiver for Class I Stream tree retention was designed to provide equivalent stream shade and LOD recruitment as the existing rule. Our experience has been that use of WTC decreases the amount of time necessary to install Stream Protection Zones (SPZs) and the tree retention requirements provide equal or greater tree retention and stream shade. The proposed rule adds a linkage between the WTC in the inner 50' of the SPZ with harvest in the outer 25' of the SPZ within 100' longitudinal sections. This addition increases stream tree retention in SPZ segments where a poorly stocked inner zone and a well-stocked outer zone are present. The value of the proposed rule to landowners and to achieving resource protection is embodied in its simplicity and we fully support the proposed changes to the Shade Rule.



Modification of the Class I stream definition at 010.60.a. will align the definition with aquatic life beneficial uses and is a needed clarification that will maintain stream protections for water quality and aquatic life.

Cable Assist Logging

The addition of definitions for Traction-Assisted Harvesting and elimination of the requirement to obtain a variance for cable-assisted machinery when working immediately adjacent to a stream are important changes that keep the FPA rules consistent with advancing technologies. Logging contractors working for PotlatchDeltic have been utilizing cable-assisted equipment since 2016 and our collective experience is that cable-assisted machinery has a light footprint and virtually eliminates loss of traction, spinning of tracks and sliding that can cause soil disturbance. Importantly this technology also increases safety for logging contractors.

Road BMPs

The new and additional road measures and clarified language for road Best Management Practices (BMPs) are well targeted to further minimize sediment and increase stream protection. Rocking of Class I stream crossings during new construction and reconstructions and armoring of culverts greater than 30" for new stream crossings are practices that we frequently implement. Requiring these BMPs in all instances will increase landowner costs. Modifications that increase costs should only be made based on research results that provide empirical data that the modifications will be effective at minimizing resource impacts and with the benefit of applied field experience demonstrating the modifications are reasonable to implement. For us these measures meet both criteria.

Maintaining and improving a strong FPA that is scientifically informed and supported by the input of technical experts and resources professionals on the Forest Practices Act Committee is critical to protecting Idaho's natural resources, promoting healthy timberlands and maintaining forest product dependent communities. We fully support the entire Proposed Rule set published in IDAPA 20.02.01.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Ball", written over a light blue horizontal line.

Darin Ball
Vice President Timberlands



Cc:

Craig Foss, State Forester IDL

Archie Gray, Bureau Chief, Forestry Assistance IDL

Trevor Stone, Idaho Timberlands Manager PotlatchDeltic

Anna Torma, Vice President Public Affairs PotlatchDeltic

Kit Hart, Director Forest Planning and Environment PotlatchDeltic