

DIRECTOR'S OFFICE
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DUSTIN T. MILLER, DIRECTOR
EQUAL OPPORTUNITY EMPLOYER

STATE BOARD OF LAND COMMISSIONERS
Brad Little, Governor
Phil McGrane, Secretary of State
Raúl R. Labrador, Attorney General
Brandon D Woolf, State Controller
Debbie Critchfield, Sup't of Public Instruction

May 14, 2024

Gregory LeDonne
Western Watersheds Project
PO Box 2863
Boise, ID 83701

Re: Negotiated Rule Making Written Comments

Dear Mr. LeDonne:

Thank you for attending the public hearings for the negotiated rule making for IDAPA 20.03.14 Rules Governing Grazing, Farming, Conservation, Noncommercial Recreation, and Communication site leases.

We received your written comments requesting certain definitions and opposing any changes to Section 030 - Change in Land Use. Upon consideration of all comments received, the Idaho Department of Lands (IDL) will not make changes to Section 030. It is IDL's position that significant delays in the Board's ability to allow for a change in use may be in opposition to the constitutional obligation of the Board to secure the maximum long-term financial return for the endowment beneficiaries.

We have also considered the request for the addition of definitions, however IDL will not be including definitions for grazing, farming, or conservation in IDAPA 20.03.14. These leasing programs operate well under the broad understanding of the various uses under the grazing, farming, and conservation programs and that practice has not been a limiting factor in IDL's ability to issue leases to interested parties or administer these programs.

Again, we appreciate your comments and participation in the negotiated rule-making process. The proposed rule will be published in early July and there will be a 21-day written comment period for the proposed rule. Please feel free to contact IDL with any questions or concerns.

Respectfully,

A handwritten signature in black ink, appearing to read "Addie Faust", is written over a light blue horizontal line.

Addie Faust
Natural Resource Leasing Program Manager

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May 14, 2024

Cameron Mulrony
Idaho Cattle Association
2120 W Airport Way
Boise, ID 83705

Re: Negotiated Rule Making Written Comments

Dear Mr. Mulrony:

Thank you for attending the public hearings for the negotiated rule making for IDAPA 20.03.14 Rules Governing Grazing, Farming, Conservation, Noncommercial Recreation, and Communication site leases.

We received your written comment regarding Section 030 - Change In Land Use, requesting that any change in use that is incompatible with grazing, should be delayed until the expiration of the current lease. Upon consideration of this comment, Idaho Department of Lands (IDL) will not make the recommended change to the rule. It is IDL's position that significant delays in the Board's ability to allow for a change in use may be in opposition to the constitutional obligation of the Board to secure the maximum long-term financial return for the endowment beneficiaries.

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May 14, 2024

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May 14, 2024

Russ Hendricks
Idaho Farm Bureau Federation
500 W Washington St.
Boise, ID 83702

Re: Negotiated Rule Making Written Comments

Dear Mr. Hendricks:

Thank you for attending the public hearings for the negotiated rule making for IDAPA 20.03.14 Rules Governing Grazing, Farming, Conservation, Noncommercial Recreation, and Communication site leases.

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May 14, 2024

Patxi Larrocea-Phillips
Idaho Wool Growers Association
55 SW 5th Avenue, Suite 100
Meridian, ID 83642

Re: Negotiated Rule Making Written Comments

Dear Mr. Larrocea-Phillips:

Thank you for attending the public hearings for the negotiated rule making for IDAPA 20.03.14 Rules Governing Grazing, Farming, Conservation, Noncommercial Recreation, and Communication site leases.

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