

From: [Gary Hess](#)
To: [Amy Johnson](#)
Cc: [Ara Andrea](#)
Subject: FW: Comment Letter for Shade Rule
Date: Thursday, August 29, 2019 5:56:10 PM
Attachments: [Shade Rule Comment letter 2019.pdf](#)

From: Paul Buckland <paulbuckland@iepco.com>
Sent: Wednesday, August 14, 2019 1:05 PM
To: Ara Andrea <AAndrea@idl.idaho.gov>
Cc: Gary Hess <GHess@idl.idaho.gov>
Subject: Comment Letter for Shade Rule

Ara and Gary,

Attached is my written comment for the Shade Rule Hearing. I'll see you tomorrow!

Paul Buckland, CF
Forest Resource Manager
Inland Empire Paper Company
509-924-1911

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August 14, 2019

Ara Andrea
Forestry Assistance Bureau Chief
Idaho Department of Lands
3284 W. Industrial Loop
Coeur d'Alene, ID 83815

RE: Comment on Class I Stream Protection Rules

Dear Gary,

Thank you for the opportunity to comment on the current Class 1 Stream Protection rules

Inland Empire Paper Company (IEP) owns and manages about 60,000 acres of commercial timberland in Idaho. As a small an industrial timberland manager and small forest land owner, I believe that active forest management is the best way to achieve sustainability for Idaho's forests. The Idaho Forest Practices Act plays an important role in this sustainable system by promulgating and enforcing rules that balance natural resource extraction *and* protection.

Over several years of deliberations, the Forest Practices Act Advisory Committee (FPAAC) provided the Idaho Department of Lands (IDL) with technical advice on a new rule for Class 1 Stream Protection Zones, commonly called the "Shade Rule". This new Shade Rule was implemented in 2014 and was based on input from various stakeholders and informed by scientific study. In contrast to the old rule, this new rule is measurable pre- and post-harvest, based on scientific data, and allows for landowners to choose between different implementation options. I have had to opportunity to implement the new Shade Rule on several projects and can attest that it is a great improvement compared to the old rule.

I also applaud the IDL for quickly initiating the adaptive management process for the new Shade Rule. As you know, the adaptive management process is designed to measure the effectiveness of the Rule by collecting data on streams in which the new rule has been implemented. This shade effectiveness study was also a coordinated effort between multiple stakeholders including small and large landowners, The University of Idaho, the Idaho Department of Environmental Quality, and the IDL. I understand the

results of this study will soon be made available and will help inform the FPAAC on whether rule modifications are warranted. Until such time, the existing Shade Rule should remain in place.

The current Shade Rule was developed by informed stakeholders and seeks to balance operational feasibility and resource protection. The adaptive management principles practiced by the IDL allow for the periodic examination and potential modification of rules and regulations so they are responsive to the needs of society, industry, and the environment. These principles are at the very heart of “sustainability” and are exactly how rules and regulations should be enacted.

Sincerely,

A handwritten signature in black ink that reads "Paul Buckland". The signature is written in a cursive style with a large, sweeping flourish at the end.

Paul Buckland, CF
Forest Resource Manager – Inland Empire Paper Company
FPAAC Vice-Chair – General Public Representative At-Large
Idaho Forest Owners Association Director