

Docket No. 58-0101-1901 Dated July 25, 2019

Comments on behalf of the Associated Logging Contractors of Idaho, Inc. provided by Jerry Deckard of CapitolWest Consultants, LLC.

After attending the session on August 1, 2019 at the DEQ headquarters office it is important to relate the information following to the agency.

The most important takeaway from the meeting conversations is the fact that the two agencies of DEQ and Idaho Department of Lands have work to do prior to advancing any rule is to find harmony of the two agendas as it relates to slash burning in particular. There needs to be an understanding that slash burning cannot take place at any time during the year. Conditions must be appropriate.

Once an effort is made to find no conflict in the rules and laws relating to burning and particular slash burning then one could see where the continuing process of smoke management might proceed.

The issue of "burn boss" probably will require additional work to determine a reasonable and feasible definition for the responsible person involved in the slash burning project.

As the proposal stands today there appears to be a significant disconnect with the Governors press releases relating to cutting rules and regulatory burdens .

Questions still remain as to what the "smoke management school" will entail.

Finally, at this point in the process it seems much more work needs to be done with the people directly involved in the forest products industry prior to the proposal that is laid out for negotiated rulemaking.

Thank you for the opportunity to provide comments and we look forward to additional opportunities as progress is made.