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**The Honorable Judge Peter M. Davenport  
Office of Administrative Law Judges  
1400 Independence Ave., S.W.  
Room 1031 South Building  
Washington, D.C. 20250-9200**

**Re: Sourcing Area Application – Stimson Lumber Co.  
Docket Number 12-0338**

**Idaho Forest Group (IFG) is submitting this comment letter in opposition to the Sourcing Area for Stimson Lumber Co. St. Maries, Priest River and Plummer Idaho sawmills. Idaho Forest Group owns and operates 5 sawmills in Idaho and directly competes with Stimson on both Federal and State Timber sales.**

**IFG opposes Stimson's Sourcing Area Application because of the current proposed boundary. The Idaho / Washington state line does not provide an economic or geographic separation from Stimson's timber land in N.E. Washington and their manufacturing facilities in Idaho. Currently Stimson hauls timber from their N.E. Washington lands to their milling facilities in Idaho along with logs from Federal and State timber sales that they purchase. As the boundary is currently proposed Stimson could export logs from the N.E. Washington lands and substitute them with logs purchased from Federal and State timber sales from the same geographic area into their Idaho milling facilities. Because of the current proposed boundary IFG opposes the Sourcing Area Application.**

**IFG would offer support for this Sourcing Area Application if the boundary were moved to the west far enough to give some economic and geographic separation from their mills in Idaho. IFG feels that using the Columbia River or possibility the crest of the Cascade Mts. Would make for a reasonably proposed boundary. This would then guarantee**

**that logs would not be substituted using Federal and State timbers sales into Stimson's Idaho milling facilities.**

**Thank you for the opportunity to comment on the proposed Sourcing Area Application Docket Number 12-0338.**

**Sincerely,**

A handwritten signature in black ink, appearing to read "Alan Harper", written in a cursive style.

**Alan Harper  
Resource Manager  
Idaho Forest Group**

**cc: Regional Forester**