June 13, 2012

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

Docket # 12-0338

Dear Honorable Judge Peter M. Davenport,

The Lands Council, a 501c3 not for profit conservation group based in Spokane, Washington would like to provide public comment to the request by the Stimson Lumber Company for a Sourcing Area for its Priest River, Plummer and St. Marie's, Idaho sawmills.

The Forest Resources Conservation and Shortage Relief Act of 1990 (P.L. 101-382, 104 Stat. 1714-726; 16 U.S. C. Sec. 620, et seq.), as amended by the Forest Resources Conservation and Shortage Relief Act of 1997 (P.L. 105-83, Title VI, Nov. 14, 1997, 111 Stat. 1617), prohibits direct and indirect substitution of federal timber for timber exported from certain private lands.

The Lands Council believes there needs to be a geographic separation between the private lands that Stimson may wish to export unprocessed logs from, and their mills in Idaho. On the west side of the proposed Sourcing Area, the proposal to use the Idaho/Washington line does not give that separation. In fact their own private lands in northeast Washington lie only a few miles from their mill in Priest River and directly adjacent to the Idaho Panhandle National Forest.

The proposed Sourcing Area is described as continuing north to Canada on the Idaho and Washington border north from the point where Oregon, Idaho and Washington meet. We ask that their Sourcing Area boundary be expanded westward to the Columbia River, with the boundary being Interstate 90 on the south side. We have attached a map showing the modified Sourcing Area that we believe is appropriate. We appreciate the opportunity to comment.

Sincerely,

Mike Petersen

Mike Petersen, Executive Director

CC: Regional Forester, ATTN: Director, RRM, 200 East Broadway, P.O. Box 7669, Missoula, MT 59807

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Earth Share of Washington

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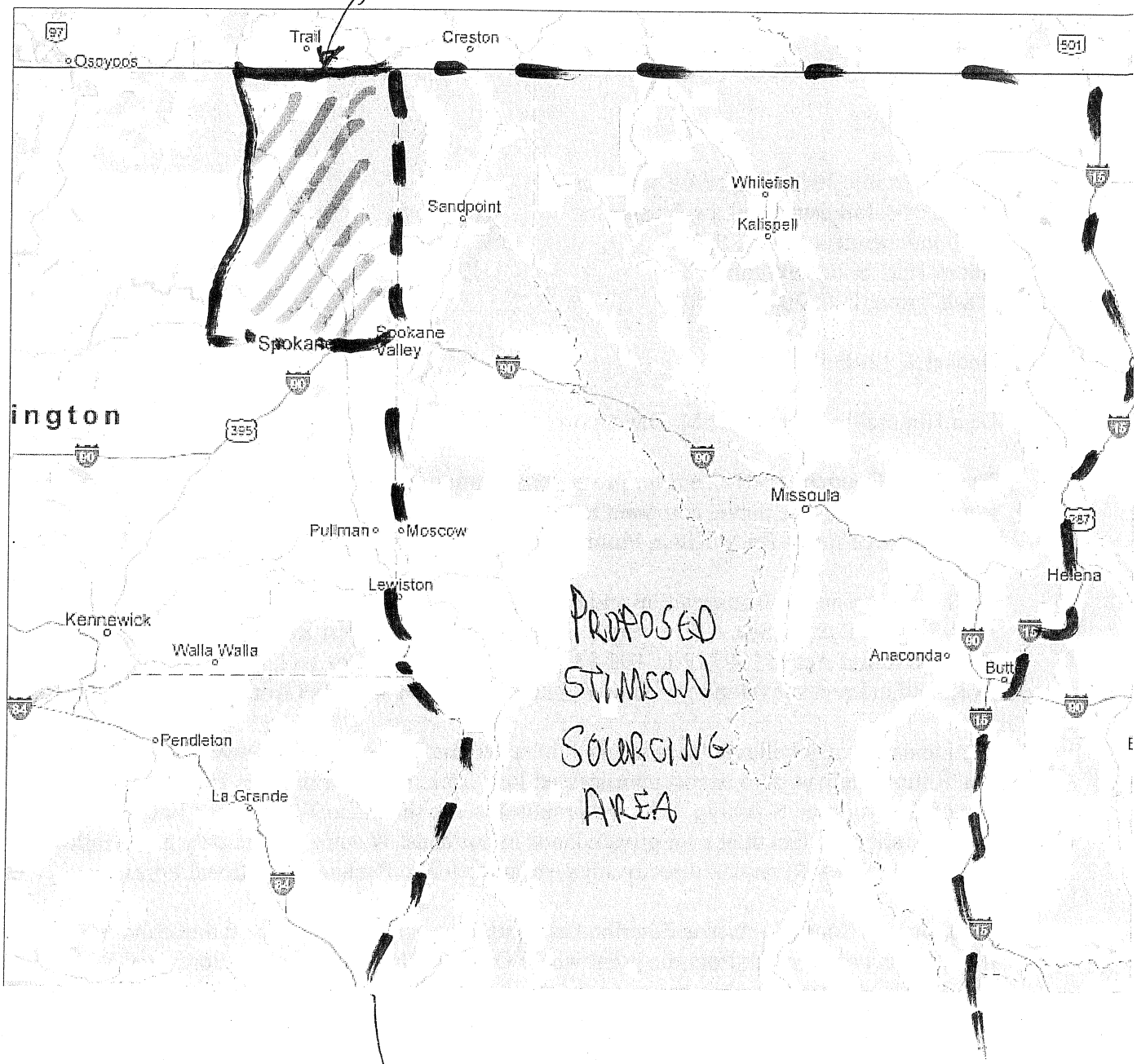
Modified additional
SOURCING AREA



The Lands Council

Mike Petersen
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