



F.H. STOLTZE LAND & LUMBER COMPANY

Lumber Manufacturers

Box 1429 Columbia Falls, MT 59912
Phone (406) 892-7005 Fax (406) 892-1612
www.stoltzelumber.com

November 29, 2012

Lathrop Smith
Forest Management Service Center
2150 Centre Ave, Bldg. A
Fort Collins, CO 80526-1891



RE: FR Vol 77, No. 202 Notice "Information Collection; Advertised Timber for Sale"

Dear Mr. Smith,

On behalf of F.H. Stoltze Land & Lumber Co, please accept the following comments on the proposed changes to Bid Forms for Advertised Timber for Sale.

We are strongly opposed to the inclusion of section 16c. "**TIMBER SALE CONTRACT VOLUME DISPOSITION – NONMANUFACTURERS: The bidder estimates that _____ percentage of the advertised sawtimber volume from this sale will be sold and/or exchanged to a small business manufacturer**" in any of the proposed timber sale bid form formats.

It is wholly inappropriate to accept off the cuff estimates on volume disposition by non-manufacturers when the actual data on volume disposition between Large and Small manufacturers is readily available to the USFS. The proposal to include this language on the bid form and use it as a proxy for actual disposition data is fraught with opportunity for significant inaccuracies and potential abuse of the SBA program.

The administration of the SBA Timber Sale program must be based upon accurate analysis of the actual distribution of sawlog volume between Large and Small manufacturers in order to be equitable to all parties. Now more than ever, due to the pitifully small overall volumes available for sale from USFS lands, it is critical that the data used to manage the SBA Timber sale program is accurate.

It would appear that with the automated timber sale accounting systems that are currently in place, the data is more readily and easily accessible than ever before. In our region, the USFS tracks and records each and every load of both sawlog and non-sawlog material by weight and destination. This data should be readily available for use in the administration of the SBA timber sale program.



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This information historically has been tracked and reported to the SBA via USFS forms which in our understanding no longer exist. This was achievable in an era when the data was not available electronically and the volumes sold were dramatically higher! The information has as much if not more value today as it was at the inception of the SBA program. We understand that this detailed information may not be available in all regions, but where it readily is, it should be used.

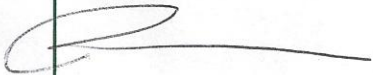
This proposal appears to be yet another indication that the USFS is not taking the SBA Timber Sale program seriously and putting forth the effort necessary to make the program work. Nor is the USFS adhering to the intent of the 1971 MOU that describes how the two agencies are to cooperate. The SBA continues to struggle with how to equitably administer a program where the vital data needed is becoming less and less available only due to the unwillingness of the USFS to share it.

The SBA may be willing to compromise on this issue based solely on the pretense that some information is better than none at all. We are not willing to accept that low of a standard. We know that the USFS has the accurate information available in many regions across the nation. We feel strongly that in those areas, actual data must be made available to SBA.

Once again, we oppose the inclusion of section 16C on the bid form and the use of the acquired data as a proxy for actual data on disposition of sawtimber volume between large and small manufacturers for the purpose of administering the SBA Timber Sale Program.

Please keep us informed of revisions to your proposal and we would be glad to clarify our statements or answer questions if you wish.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Paul R. McKenzie', with a long horizontal line extending to the right.

Paul R. McKenzie
Lands & Resource Manager